No. 7242 Equity

Bill of Complaint.

First:- That your Complainant, Mary E. Keller, was on the 6th day of December in the year 1892, by an order of the Orphans Court of Frederick County, appointed Guardian of the said Emma F. Keller, Clara F. Keller, Annie V. Keller, Mary E. Keller Manzella E. Keller, John C. Keller and David N. Keller, as will appear by reference to a certificate show said appointment filed herewith as Exhibit A which together with all other Exhibits herewith filed it is prayed may be taken and considered as a part of this Bill, and that since said appointment, the said Emma F. Keller and Clara F. Keller, have arrived at the age of twenty one years, and both have released the said Mary E. Keller as guardian aforesaid, but that she is still Guardian for the remainder of said wards.

Second:- That John D. Keller, late of Frederick County, but now deceased, was in his life time and at the time of his death seized, and possessed of certain real estate situated in Frederick County, in the State of Maryland, among which was a piece of land, containing Nine Acres of land more or less, the same being the last mentioned piece or parcel of land conveyed to the said John D. Keller by deed executed by Ann E. Keller et al, dated February 13th A. D. 1889, and duly recorded in the Land Records of Frederick County, as will appear by a certified copy of said deed filed herewith Marked Exhibit B.

Third:- That the said John D. Keller being seized as aforesaid, departed this life intestate in or about the year 1891, leaving surviving him, a widow, the said Mary E. Keller, and the following heirs at law, Viz:- Emma F. an adult daughter, one of the Complainants, Clara F., an adult daughter, one of the Complainants, both of whom reside in Frederick County, Annie V. a daughter; Mary E. C., a daughter, Manzella E., a daughter; John C. a son, and David N., a son, all of whom are infants under the age of twenty-one years, and reside in Frederick County, Annie V., a daughter; Mary E. C. a daughter, Manzella E. a daughter, John C., a son, and David N. a son, all of whom are infants under the age of twenty one years; and reside in Frederick County, Maryland.

Fourth:- That the said John D. Keller and his wife, Mary E. Keller, being indebted unto Charles S. Keller upon their promissory note, dated March 1st 1889, for the sum of One thousand Dollars, executed to the said Charles S. Keller a deed of Mortgage conveying the property mentioned in Exhibit B. except the said portion last mentioned therein containing Nine acres of land, more or less, which mortgage has been assigned in writing to your Complainant Mary E. Keller and all of the children of the said Mary E. Keller and John D. Keller hereinbefore named as will appear by a certified copy of said Mortgage and assignments, filed herewith and Marked Exhibit C.

Fifth:- That the said Mary E. Keller, Emma F. Keller and Clara F. Keller acting in their own right, and the said Mary E. Keller, as guardian for the said Annie V. Keller Mary E. C. Keller, Manzella E. Keller, John C. Keller and David N. Keller, infants, acting on behalf of said infant acting on behalf of said infants, sold Six Acres, Two Roods and 39 square perches, of said Nine Acres of land last mentioned in said Exhibit B. to Douglass H. Hargett, together with all roads and ways thereto belonging at and for the sum of Two hundred and forty six dollars and three cents as will fully appear by acknowledgment of purchase signed by said purchaser