

No 7811 Equity.

Bill of Complaint.

Filed August 19, 1904

Sarah D. Kelley <sup>and</sup> Wollie  
Kelley her husband Ella  
C. Eastaday, Fayette D.  
Souders, Rachel Virginia  
Eastaday Fletcher Marion  
Eastaday Leslie Nelson  
Eastaday Washington Kendrick  
Eastaday, and Ruth Eastaday,  
infants, by their mother and  
next friend, Martha Amelia  
Eastaday.

Plaintiff.

vs  
Fayette S. Souders and Laura  
V. Souders, his wife.  
Defendants.

No 7811 Equity  
In the  
Sescent Court  
for  
Frederick County  
Sitting as  
Court of  
Equity.

To the Honorable, the Judge of said Court:-  
The Bill of Complaint of Sarah D. Kelley and  
Martin Kelley her husband, Ella C. Eastaday, John  
S. Eastaday, Fayette S. Souders of Jefferson County, West  
Virginia Eastaday of St. Louis, State of Missouri, and  
Adelbert and Berner Standing Eastaday, Fletcher Marion  
Eastaday, Leslie Nelson Eastaday, Washington Kendrick Eastaday  
and Ruth Eastaday, infants by their mother and next  
friend, Martha Amelia Eastaday of the City of St. Louis  
State of Missouri, plaintiffs against Fayette S. Souders  
and Laura V. Souders his wife of Washington County,  
State of Maryland Defendants respectfully show unto  
Your Honor:

1. That Rachel Ann Eastaday, Sarah V. Eastaday, Jacob  
F. W. Eastaday and Joann C. Eastaday were in  
their lifetime seized of a certain tract or parcel  
of Real estate situated in said Frederick County Maryland  
containing 6 Acres, 3 Rods, and 6 perches of Land Comped  
to them as tenants in Common by Samuel Wargett, and  
John W. Wargett Esqrs, by deed dated February 6th  
A. D. 1861 and recorded among the Land Records of  
said Frederick County, Maryland in Liber B. G. P. No 6  
folio 441, a certified copy of which deed is herewith  
filed as part hereof marked Exhibit No 1.
2. That being so seized one of said grantees, Joann  
C. Eastaday died intestate and unmarried August  
11th, A. D. 1861 leaving as his heirs at law, said  
Sisters, Rachel Ann, Sarah V. and brother Jacob F. W.