marked Exhibit B. and that your Orator has paid and secured to the said Barbara the said purchase money. And he states that the said George Lippy refused to unite with the said Barbara in a sale & conveyance of said land. And your Orator further states and shews that the sale of said land to your Orator is conducive to the interest support and maintenance of the said Barbara who is an old lady over seventy years of age and unable to superviese or conduct the management and cultivation of said land and that the income arising from the said Purchase money will support and maintain the said Barbara much more comfortably than would the income from said land itself and that the interest of said purchase money is a greater sum than the said Barbara could obtain as a rent for said Farm. Your Orator further shews that he is advised that in consequence of the said agreement between the said George and the Barbara not having been made in the form of a Deed or Indenture and in consequence of the said George not having conveyed to a Trustee for the benefit of said Barbara his interest and estate in said land and in said conveyance given for the power to use and dispose of it as a feme Sole free from his interference or control and in consequence of said agreement not having been made and drawn as to give to said Barbara a right to sell and dispose of said land and convey the same either in her own name & through the intervention of a Trustee the said Conveyance by the said Barbara to your Orator cannot operate to convey to him a complete legal title to said land but that it can only operate to leave to him a right in Equity to said land and premises and that he is entitled in Equity to enforce a conveyance of said land & of all his the said Georges right and interest therein by the said George to your Orator & that he is entitled to have and that a Court of Equity will decree that the said George and the said Barbara shall execute a conveyance to him of said Land & that a Court of Equity will in case more protect him in his said purchase and upon to obtain the legal title to said land and premises. In tender consideration hereof and for as much as your Orator is remediless in the premises save by the aid and interposition of your Honor in the premises to the end therefore that the said George Lippy may be decreed to convey all his estate and interest in said land and premises to your Orator & that the said George Lippy and the said Barbara Lippy may be decreed to unite in a conveyance of a complete legal title to said land to your Orator in such manner as to assure to your Orator a title to said land as to your Honor shall seem meet. And that your Orator may have such other and further relief as in Equity he may be entitled to may it please your Honor to grant to your Orator a Writ a Writs of Subpoena to be directed to the said George Lippy and the said Barbara Lippy both of Carroll County commanding and enjoining them and each of them on a certain day therein to be named to be and appear in your Honors Court then and there to answer the premises and to stand to abide by perform and fulfill such order and decree as your Honor may pass in the premises and your Orator will ever pray &c

Wm. P. Maulsby
Solr for Compt

The Exhibit marked A. referred to in the aforegoing Bill of Complaint as follows, Viz^t.

Exhibit A. This Indenture made and entered into this 1st day of September 1837 between George Lippy & Barbary his wife Witnesseth that whereas they have mutually in consequence of various unhappy differences to live seperately and apart from each other during the remainder of their lives the said husband has agreed and hereby does agree to allow his said wife as follows for her maintenance and support & and for her property in as full and ample a manner as if she were a feme Sole forever that is to say the Farm that was willed to her by her Father George Reinhart in Carroll County containing about 80 Removed and 85 acres of land also Two Removed dollars worth of household furniture farming utensils Stock and fodder for them, provisions hogs and fowls for them to be selected and appraised by Adam Beck and John Lanzer. and the said wife has agreed and hereby does agree to relinquish and does hereby relinquish all right title and interest in the Estate of said Husband both during his life and after her death in case she survives

The men to appraise by or before the tenth day of September instant to give an Inventory of the same to be left with John Baumgartner Esq^r Register of Wills for Carroll County said husband agrees for the aforesaid & forever to live seperately and apart from him and that she pleases as if sole. Each party to pay one half of all the expenses of the seperation. In Witness whereof the said parties have hereunto set their hands and affixed their seals the day and year first before written.

Witness
James Kaymond
Jacob Mathias

Signed George Lippy (Seal)
Barbary her x mark Lippy (Seal)

True Copy

State of Maryland Carroll County to wit. I hereby Certify that the aforegoing is a true copy taken from the original files in the case of Barbary Lippy by her next friend Peter Masenheimer against George Lippy being number 387 in the Circuit Court for Carroll County as a Court of Equity

In testimony whereof I hereto subscribe my name and affix the Seal of the Circuit Court for Carroll County this 2d day of December 1862.

(Seal)

Wm. P. Boyle Clk

The Exhibit B. referred to in the aforegoing Bill of Complaint is as follows to wit

Exhibit B. This Indenture made this first day of December in the year Eighteen Hundred and fifty four between Barbary Lippy of Carroll County in the State of Maryland of the one part and Peter Masenheimer of the same County and State of the other part. Whereas by an agreement in writing bearing date on the first day of September in the year Eighteen Hundred and Thirty Seven and now filed amongst the proceedings in the cause No 387 in the Docket of the Circuit Court for Carroll County sitting in Equity between George Lippy the husband of the above named Barbara Lippy and the said Barbara it was stipulated that the said George and the said Barbara should thenceforth live seperate and apart and that the said Barbara should have for her property in as full and ample a manner as if she were a feme Sole that Trustees

Barbara