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Humbly complaining show unto your Honors, your orators and oratrixes, Jeremiah L. Townshend, Thomas H. Armstrong, and Maria Armstrong his wife, Catharine Ridgely, Mary Virginia Townshend and Singleton Townshend, infants, by your orator, Jeremiah L. Townshend their next friend, Richard Drane an infant by Marine Drane his next friend, all of Allegany County, in the State of Maryland, and Maria Drane and Teasel and Priscilla Ann Teasel his wife of the State of Missouri; - That a certain Paul Hoye late of Washington County in the State of Maryland departed this life leaving his last will and testament in writing bearing date on the ninth day of April in the year of Our Lord one thousand eight hundred and thirteen, and thereby, amongst other bequests, devised & bequeathed unto a certain John Hoye and Leonard M. Deakins and the survivor of them in trust for the uses and purposes and none other hereafter mentioned, all that tract of land lying and being in Allegany County in the State of Maryland called "The Gleanings" patented to the said Paul Hoye by the State of Maryland for five thousand one hundred and fifty four acres (except such parts of said tract as had been previously sold by the said Paul Hoye in his lifetime) also one other tract of land called "Crabtree Bottom" containing one hundred and twelve acres, also one other tract called "Locust Thicket" containing forty one and one quarter acres, and also four certain lots of land lying and being in said Allegany County and within the lands reserved by the State of Maryland westward of Fort Cumberland, each lot containing fifty acres more or less; and likewise all the stock and farming utensils on the farm whereon William W. Hoye then lived in said Allegany County; and also a negro man named Harry and a negro woman named Rhoda and her children (except her daughter Maria), which she then had or might thereafter have, To have and to hold unto them the said John Hoye and Leonard M. Deakins and the survivor of them for the uses, upon the trusts and to the intents and purposes (and none other) following that is to say, upon trust to permit and allow the children of his son William W. Hoye to have the use and enjoyment of the said tracts or parcels of land together with the stock negroes and farming utensils, and to have and receive the rents, issues and profits of the same jointly and for their mutual benefit and support, but no part thereof to be subject to any debts contracted by the said William W. Hoye; and it was the intention and mind of the said testator that the aforesaid trust to the said John Hoye and Leonard M. Deakins should continue in force until the death of the said William W. Hoye and until his youngest child should arrive at lawful age, and the will then provided that the aforesaid land and negroes

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with their issue should then be equally divided amongst the children of the said William W. Hoye or their legal representatives, as by a true copy of the said last will and testament of the said Paul Hoye deceased herewith filed marked "Exhibit A" and which together with all other exhibits hereinafter referred to, your orators and oratrixes pray may be taken and considered as a part of this their bill of complaint, will more fully and at large appear.

And your orators and oratrixes further show that the said Paul Hoye afterwards to wit sometime in the year eighteen hundred and sixteen departed this life, and the said John Hoye who was one of the executors and trustees named in the said will, upon or soon after the death of the said testator, duly proved the said will and took upon himself the execution thereof and the trust thereby reposed for the benefit of the children of the said William W. Hoye, and possessed the stock, farming utensils and Negroes and their issue named as aforesaid in the said will and entered into possession of the Real Estate of the said testator above mentioned, or into the receipt of the rents and profits thereof and continued in such possession or receipt until his death which occured sometime in the month of June in the year eighteen hundred and forty nine.

And your orators and oratrixes further shew that the said William W. Hoye departed this life intestate as to his real estate sometime about the year eighteen hundred and thirty four, leaving the following named children surviving him, that is to say Ann wife of Elijah Bishop, John Hoye, Samuel Hoye, Eleanor S. since intermarried with George Pearson, David Hoye, Daniel J. Hoye, Edward Hoye, Eli Hoye, Sarah Jane Hoye, Elizabeth Hoye, Mary Ann wife of Marine Drane, Tabitha since intermarried with Jeremiah Townsend, Mariah since intermarried with Thomas H. Armstrong, Catherine since intermarried with William Ridgly, Eliza wife of George W. Drane and Marion L. Hoye; that the said Eli Hoye and Sarah Jane Hoye have since departed this life intestate and without issue; that the said David Hoye hath also since departed this life intestate leaving his widow Elizabeth Hoye surviving him and the following named children and heirs at law viz: Mary Elizabeth Hoye, Elijah Hoye, Benjamin Franklin Hoye, all of whom are infants under age; that the said Tabitha the wife of your orator, Jeremiah L. Townsend hath also departed this life leaving your orator her said husband surviving her, and the following named children her heirs at law namely: Mary Virginia Townshend and Singleton Townshend both of whom are infants under age; that the said Eliza Drane and George W. Drane her husband have also both departed this life leaving Maria Drane one of your oratrixes their only child and heir at law;