

at-law of said decedent, which in justice and equity ought to be removed therefrom.

XVI.—That the said Henry J. Williams, Esq., is collecting the rents of the real estate and the interest on the ground rents and moneys belonging to your orators, and refuses to account to your orators for the same.

XVII.—That the said Dr. James Rush died seised of a large number of houses and lots in the said City of Philadelphia, and ground rents upon numerous properties, to determine the right to which in the Courts-at-law would require a multiplicity of suits.

XVIII.—That it is the intention of the said Henry J. Williams, Esq., to sell the real estate and ground rents of which the said Dr. James Rush died seised, and use the proceeds thereof, together with the personal estate of said decedent, in the foundation of a library without the consent of your orator, and contrary to his wishes.

XIX.—That your orator complains herein only against the said Henry J. Williams, Esq., and “The Library Company of Philadelphia,” because the bequests set forth in “Exhibit A,” to the heirs-at-law, are less than their shares of said estate under the intestate laws of this Commonwealth; and also for the reason that the said heirs at law may become plaintiffs herein, if they see fit to do so. The other persons named in the said writings (to wit, the legatees who are not next of kin of said decedent), are unknown to your orators, and they do not intend to make their legacies the subject of dispute.

And your orator charges that by reason of the premises, the said Henry J. Williams now holds the estate of said decedent, and the increase thereof, as the trustee for your orator, and refuses to account to your orator therefor.

Wherefore your orator needs equitable relief, and he prays:—

