

said last mentioned mortgage has been assigned on the said land records of said Frederick County, unto Raymond L. Shaff on October 20th 1890, by order of the Orphans Court for said Frederick County, wto., which by reference to said land record will more fully and at large appear, and that the said last mentioned mortgage was given in full payment of the said mortgage to Andrew Kessler, and others as above described, which said Andrew Kessler's mortgage should have been fully released when paid, but the same was neglected and your complaint further alleges that the said mortgage to the said Margaret Hoteler, and assigned as aforesaid to Raymond L. Shaff, has been fully paid and should have been and will be released on the said land records.

Fifth That the said real estate described in Exhibit No. 1 filed herewith as a part hereof as aforesaid, consists of a single house and lot, worth probably \$800 or \$1,000 and is not capable or susceptible of being divided amongst the parties interested without great loss, damage and injury to those interested in the same, and it would be to the best interest and advantage of all parties having an interest therein that the same should be sold under a decree of Your Honorable Court, and the proceeds divided amongst the parties entitled thereto, according to their respective rights and interests, the interest of the said infant defendant to be invested for her benefit.

To the End Therefore--

That the said real estate may be sold under an order and decree of Your Honorable Court, free, clear and discharged from all unreleased mortgage claims, and the proceeds distributed amongst the parties interested and entitled thereto, according to their respective rights and interests, the interest of said defendant to be invested for her benefit under the order of Your Honorable Court, and that a trustee or trustees may be appointed by the order and decree of your Honorable Court to make said sale.

And for such other and further relief as the nature of their case may require.

May it please Your Honorable Court to grant unto your said orators an order of publication against the said Bartha Hale, widow, Daniel Hale, Londa Hoffman and Lewis Hoffman, her husband, Albert Hale and Minnie Hale, his wife, and Fannie and George her husband, Marie Hale and Esther Hale, an infant, all of whom reside in Bloomington, in the State of Illinois, and are non-residents of the State of Maryland, giving notice to them and each of them, of the object and purpose of this Bill of Complaint, and warning them and each of them to be and appear in this Court, either in person or by solicitor, on a certain day to be named therein, and to answer the premises and show cause if any they have, why a decree should not be passed as prayed, and to abide and perform such decree as may be passed therein.

And as in duty bound etc.

Arthur D. Willard
Solicitor for Plaintiffs.

EXHIBIT NO. 1.

At the request of Elizabeth A. Hale, the following deed was recorded June 1st, 1803. (Stamped & Cancelled.)

This deed made this thirteenth day of May eighteen hundred and sixty-three by Daniel Baker and Catherine Baker his wife, of Frederick County, in the State of Maryland, Witnesseth that in consideration of the sum of Three Hundred Dollars the said Daniel Baker and Catherine Baker his wife, do grant unto Elizabeth A. Hale of said County and State all those pieces or parts of tracts or lots of land situated and lying in the village of Centreville in Frederick County, Maryland, it being the same property conveyed by deed by David Hale and Elizabeth Hale his wife to Daniel Baker, said deed bearing date thirty first day of December in the year eighteen hundred and fifty seven and recorded in liber B. G. F. No. 1 folio 96, 97, one of the land records of Frederick County. Witness our hands and seals.

Test--
A. Delashmutt
Wm. G. Baker.

Daniel Baker (seal)
Catharine Baker (seal)