

Albert A. Boyer and Virginia Boyer, his wife; Carrie Bowlus and Stephen R. Bowlus her husband, William E. Boyer and Salome Boyer, his wife, Emory E. Boyer and Carrie V. Boyer, his wife; Florence Beachley and Carlton D. Beachley, her husband; Lora Boyer (Unmarried); Russell L. Boyer and Bessie Boyer, his wife,

VS.

Ettie M. Coblentz and Oliver Z. Coblentz, her husband, Charles W. Boyer and _____ Boyer, his wife.

% No. 9521 EQUITY.
% In the Circuit Court
% for Frederick County,
% sitting as a Court of
% Equity.
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The Bill of Complaint of Albert A. Boyer and Virginia Boyer, his wife, Carrie Bowlus and Stephen Bowlus, her husband, William E. Boyer and Salome Boyer, his wife, Emory E. Boyer and Carrie V. Boyer, his wife, Florence Beachley and Carlton D. Beachley, her husband, Lora Boyer (unmarried), and Russell L. Boyer, and Bessie Boyer, his wife, respectfully shows unto your Honors:-

1. That Martha M. Boyer, late of Frederick County, but now deceased, was, during her lifetime and at the time of her death, seized and possessed of a tract or parcel of land situate, lying and being in the Western End of the Village of Jefferson, in Frederick County, State of Maryland, and more particularly described in a deed from Paul C. Whipp, et al. to the said Martha M. Boyer, bearing date the 1st day of November, 1910, and duly recorded among the Land Records of Frederick County in Liber H.W.B. No. 294, folio 432, a certified copy of which said deed is filed herewith, marked "Exhibit A", and which it is prayed may be taken and considered as a part of this Bill of Complaint.

2. That being seized and possessed as aforesaid, the said Martha M. Boyer departed this life intestate, on or about the _____ day of May, A.D. 1916, leaving surviving her as her children and heirs-at-law a son, Albert A. Boyer, whose wife's name is Virginia Boyer; a daughter, Carrie Boyars, who intermarried with one Stephen R. Bowlus; a son, William E. Boyer, whose wife's name is Salome Boyer; a son, Emory E. Boyer, whose wife's name is Carrie V. Boyer; a daughter, Ettie M. Coblentz, who intermarried with one Oliver Z. Coblentz; a daughter, Florence Beachley, who intermarried with one Carlton D. Beachley; a daughter, Lora Boyer, who is unmarried; a son, Russell L. Boyer, whose wife's name is Bessie Boyer, and all of whom are adults and residents of Frederick County, Maryland; a son, Charles W. Boyer, who has been absent and unheard of for two years, of whose marriage your Complainants have heard rumors, but of which they have no definite knowledge; but in order to include the interest of any wife that the said Charles W. Boyer may have, your Complainants have joined a possible _____ Boyer herein.

3. That the property mentioned and described in "Exhibit A" filed with the Bill is not susceptible of division among the parties thereto entitled without great loss and injury, and that it would be to the benefit and advantage of all the parties to this bill to have the same sold by a Trustee or Trustees to be appointed by your Honorable Court, and the proceeds therefrom divided among the parties entitled thereto under the direction and supervision of your Honorable Court.

TO THE END THEREFORE, (a) That the property mentioned in this bill of complaint may be sold by a Trustee or Trustees to be appointed by your Honorable Court, and the proceeds therefrom distributed among the parties entitled thereto, under the direction and supervision of your Honorable Court; (b) and for such other and further relief as the nature and equity of their case may require.

MAY IT PLEASE YOUR HONORS to grant unto your Complainants the writ of sub-pœna in the usual form against the said Ettie M. Coblentz and Oliver Z. Coblentz, her husband, who reside near Middletown, in Frederick County, Maryland, commanding them to be and appear in your Honorable Court on some day certain to be named therein, either in person or by solicitor, to answer the premises and abide by and perform such decree as may be passed therein, and for an order of publication against the said Charles W. Boyer and _____ Boyer, his wife, who are non-residents of the State of Maryland, giving notice of the substance and object of this Bill of Complaint and warning them to be and appear in your Honorable Court either in person or by solicitor, on or before a day certain to be named therein, to show cause, if any they have, why a decree should not be passed as prayed.

And as in duty bound. Filed Oct. 4th, 1916. Emory L. Coblentz
Chas. McC. Mathias.
Solicitors for Complainants.