

said real estate is vested, and who now hold it as tenants in common, viz;

Ruby E. Adams, his widow, who is the complainant in this case.

and the following children.

Lula Filby, who is married, her husband being Samuel Filby

Leon M. Adams, who is seventeen years of age

Marshall Adams, who is sixteen years of age

John Q. Adams, who is twelve years of age.

Margaret Adams, who is ten years of age.

That all of said children are infants, under the age of twenty-one years, with the exception of Lulu Filby, and all reside at Frederick City aforesaid.

3. That said real estate now owned in common by the complainants and the defendants in this case, inherited as aforesaid by them from the said John Henry Adams, is not susceptible of partition without material loss and injury to the parties entitled to interests therein as above stated, and in order to make division of said interests it will be necessary for said real estate to be sold and the proceeds of sale divided among the parties hereto according to their several interests.

To the end therefore,

- (a) That a decree may be passed by this Honorable Court for the sale of said real estate.
- (b) That the proceeds of said sale may be divided amongst the parties hereto according to their respective rights and interest.
- (c) That your oratrix may have such other and further relief as her case may require.

May it please your Honor to grant unto your oratrix the writ of subpoena directed to the said Lulu Filby and Samuel Filby, her husband, and Leon M. Adams, Marshall Adams, John C. Adams and Margaret Adams, infants, all of Frederick County, State of Maryland, commanding them and each of them to be and appear in this Court on some certain day to be named therein to show cause, if any they have why the relief for which she has prayed should not be granted.

And as in duty bound &c.,

Guy W. Fell.
Attorney for Plaintiff.

EXHIBIT "A"

At the request of John H. Adams the following Deed is Received for Record and Recorded March 7th, 1899 at 1 o'clock P.M. Test; - Douglass H. Hargett Clerk.

This Deed, made this 6th day of March in the year one thousand eight hundred and ninety nine by Abraham Rosenour, May Rosenour his wife, and Gerson Rosenour, of Frederick County, Maryland,

WITNESSETH; - that in consideration of One Hundred dollars (\$100) the receipt of which is hereby acknowledged, the said Abraham Rosenour May Rosenour his wife, and Gerson Rosenour do grant in fee simple to John H. Adams of Frederick County, Maryland, all that lot of ground situate in Frederick City Frederick County, Maryland, as follows Lot 15 in Block 1 fronting 40 feet on 5th Street and running back for a depth of 187 feet more or less to a 20 foot alley said lot having the right to use said alley in common with all other lots beinding thereon, said lot is one of those shown and described on the Plat of Frederick City Manufacturing and Development Company North West Addition to Frederick Md, and recorded in Liber W.I.P. No. 13. folio 335 one of the Land Records of Frederick County aforesaid, reference thereto being had will more fully appear Being a part of the same property which was conveyed by the said Frederick City Manufacturing and Development Company to the said Abraham and Gerson Rosenour, by deed dated the Tenth day of June A.D. 1891 and Recorded in Liber W. I.P. No. 13 folio 418 one of the Land Records of Frederick County Maryland and they the said Abraham Rosenour, May Rosenour his wife, and Gerson Rosenour covenant that they will warrant generally the property hereby conveyed and that they will execute such further assurances as may be requisite.

Witness our hands and seals.

Test; - Roscoe C. White.

Abraham Rosenour (seal)
May Rosenour (seal)
Gerson Rosenour (seal)