

No. 10902 Equity.

Mary A. Hissey	"	
	"	
Vs.	"	
	"	
Mark E. Hissey, and	"	In The Circuit Court
Lillian Hissey, his	"	
wife, Gilbert L. Hissey,	"	For Frederick County,
and Mable V. Hissey,	"	
his wife, Lola L. Keller,	"	Sitting as a Court of
and Harry L. Keller, her	"	
husband, Blanche M. Bittle	"	Equity,
and John E. Bittle and	"	
her husband, Charles L.	"	No. 10902 Equity.
Hissey, Jr. infant, and	"	
Marlow S. Hissey, Infant.	"	
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TO THE HONORABLE JUDGES OF SAID COURT;-

The Bill of Complaint of your Oratrix respectfully shown unto your Honors;-

1. That Charles L. Hissey, late of Frederick County, deceased, was in his lifetime, and at the time of his death, seized and possessed, in fee simple absolutely, of the real estate and premises described in the deed from Edward L. Moore and wife, to him the said Charles L. Hissey, dated April 29, A. D. 1913, and duly recorded in Liber H. W. P. 306, folio 86 & c, one of the Land Records of Frederick County, a certified copy of which is filed herewith, marked "Exhibit "A".
2. That being so seized, the said Charles L. Hissey departed this life on or about the 3rd day of September, A. D. 1923, intestate.
3. That the said Charles L. Hissey left surviving him the following heirs at law and next of kin, viz.:-
 - (a) Your Oratrix, Mary A. Hissey, as widow.
 - (b) Mark E. Hissey, a son born of the first wife of said deceased, and Lillian Hissey, wife of said Mark E. Hissey.
 - (c) Gilbert L. Hissey, a son born of the first wife of said deceased, and Mabel V. Hissey, wife of said Gilbert L. Hissey.
 - (d) Lola L. Keller, a daughter born of the first wife of said deceased and Harry L. Keller, her husband.
 - (e) Blanche M. Bittle, a daughter born of the first wife of said deceased, and John E. Bittle, her husband.
 - (f) Charles L. Hissey, Jr., a son born of the wedlock of your Complainant with the deceased Charles L. Hissey, Sr., said son being now an infant of 13 years.
 - (g) Marlow S. Hissey, a second son born of the wedlock with your Complainant, an infant of 5 years.
4. That the said real estate consists of two building lots, improved by a two-story frame dwelling and out-buildings, and in its present state, cannot be divided equally among the parties in interest without loss and injury, and, furthermore, two of the six surviving children are infants under the age of twenty-one years, and partition cannot be made without the aid of this Court.
5. That it would be to the interest of all the parties concerned to sell the said real estate, and to invest the proceeds thereof in some productive fund for their benefit, under the direction of this Court.

To the end, therefore,

- (A) That the said Real Estate may be sold, and the proceeds thereof, after accounting, distributed under the orders of this Court.
- (B) That your Oratrix may have such other and further relief as the nature of her cause may require.

And may it please your Honors to grant unto your Oratrix the writ of subpoena, directed to the said Mark E. Hissey and Lillian Hissey, his wife, residing at Brunswick, Md., Gilbert L. Hissey, Brunswick, and Mabel V. Hissey, his wife, residing in Baltimore, Md., Lola L.