

BILL OF COMPLAINT No. 10919 Equity.

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Martha E. Longman and
Stella Longman.

Vs.

Lizzie E. Hays and
Oscar L. Hays, her
husband.

No. 10919 E Q U I T Y.

In the Circuit Court for
Frederick County,

In Equity.

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To the Honorable, the Judges of said Court;

The Bill of Complaint of Martha E. Longman and Stella Longman, respectfully shows unto your Honors;-

1. That Joshua Longman, late a resident of Frederick County and State of Maryland, departed this life on or about the _____ day of January, in the year 1914, intestate, leaving surviving him, Martha E. Longman, his widow, Stella Longman a daughter, unmarried, and Lizzie E. Hays, a daughter, whose husband's name is Oscar L. Hays, and who constitute all the heirs at law of the said Joshua Longman, deceased.
2. That at the time of his death the said Joshua Longman was seized and possessed of the following real estate, to-wit;-

FIRST; All that parcel of land situated in Catiotin Election District, Frederick County, the same being part of a tract of land called "Low Spring" and part of a tract called "Peace Approaching," being also the same parcel of land which was conveyed unto the said Joshua Longman by Simon P. Eocard and Effie M. Eocard, his wife, by deed bearing date on the 27th day of November, in the year 1882, and duly recorded in Liber 346, folio 311, one of the Land Records of Frederick County, a certified copy of said is herewith filed as "Exhibit A", and which, together with all other Exhibits herewith filed and produced, it is prayed may be taken and considered as part of this Bill of Complaint.

SECOND; All that parcel or piece of land lying and being in Frederick Count, Maryland, the same being part of a tract of land called "The Resurvey on Almost Night" and part of a tract called "Peace Approaching" and which lies on the West side of the public road commonly known as "The Spruce Run Road" and contained within the following metes bounds, courses and distances, viz; BEGINNING for the part hereby intended to be conveyed at a stone planted on the West side of the Public Road leading from Wolfsville to Garfield and at the end of $33\frac{1}{2}$ perches on the seventh line of the whole tract called "The Resurvey on Almost Night," South $16\frac{3}{4}$ ° East $50\frac{1}{2}$ perches, thence South 3 ° East 37 perches, then South 88 ° East $31\frac{36}{100}$ perches, thence North 22 °, eleven and one-half perches, thence South 75 ° East 18 perches to said public road called the Spruce Run Road, thence with said public road the two following courses and distances, viz; North 23 ° East $39\frac{1}{4}$ perches to a stake and stone on the West side of said Spruce Run Road, thence North $56\frac{1}{2}$ ° East 25 perches to a stake and stone on the West side of said road, and at the end of 14 perches on the ninth line of a certain Rose Anna Biser's part of said land as conveyed to her by will, then with said 9th line, North 48 ° West 42 perches to the end of said line, then with the 10th line of said part North $84\frac{1}{2}$ ° West 73 perches to the place of beginning, containing 40 acres, 1 rood and 1 sq. perch of land, more or less. It being the same real estate heretofore conveyed by Hannah Stottlemeyer, Roseanna Biser and D. Biser, her husband, to Joshua Longman, by deed bearing date on the 26th day of March, in the year 1883; an certified copy of which said deed is herewith filed as "Exhibit B".

THIRD; All that part of a tract of land called "Low Spring" situated in said Frederick County, Maryland, and being the same real estate heretofore conveyed by Howard Gilbert and Vinnie C. Gilbert, his wife, to Joshua Longman, by deed bearing date on the 4th day of July, in the year 1899; a certified copy of which is herewith filed as "Exhibit C".

FOURTH; All of that tract of land which was granted unto Oscar L. Hays for $65\frac{1}{2}$ acres of land, more or less, by George W. Blickenstaff, acting Executor, by deed dated February 20, 1903, It being the same real estate heretofore conveyed unto the said Joshua Longman by Oscar L. Hays and Lizzie E. Hays, his wife, by deed bearing date on the 23d day of January, in the year 1904; a certified copy of which deed is herewith filed as "Exhibit D."