

3. That said real estate cannot be divided without loss or injury to the parties interested therein, and it would be to the benefit and advantage of said parties to have said real estate sold under a decree of your Honorable Court, and the proceeds of said sale divided amongst the parties according to their several interests.

To the end, therefore;

(1) That a decree may be passed for the sale of said real estate.

(2) That a trustee or trustees may be appointed to make sale of said real estate and to divide the proceeds thereof, after the payment of all costs and expenses incidental to said sale, amongst the parties thereto entitled in accordance with their several interests.

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

May it please your Honors to grant unto your Complainants the writ of subpoena, directed to the said Lizzie E. Hays and Osear L. Hays, her husband, adults residents of Catoctin Election District, Frederick County, Maryland, commanding them to be and appear in this Court on some certain day, to be named therein, and answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.

Holden S. Felton.  
Solicitor for Complainants.

(Filed April 24, 1924)

EXHIBIT "A"

At the request of Joshua Longman the following Deed was received for record and recorded December 20, 1923, at 10.30 O'clock A.M.

Test;- Eli G. Haugh, Clerk.

This Deed made this 27th day of Nov. in the year Eighteen Hundred and eighty two, by Simp P. Eppard and his wife Effie Eppard of Frederick County, in the State of Maryland Witnesseth;- that in consideration of One Hundred and seventy five dollars, the said Simp P. Eppard & wife, do grant unto Joshua Longman of said County, all that parcel of land, situate in said 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 Simon P. Eppard, by John Baker of P & wife, by deed dated Feb. 11th, 1881, and recorded in liber S.F. No. 4 Folio 567, one of the Land Records of Frederick County, all of which is hereby intended to be conveyed and guaranteed unto the said Joshua Longman by us .

Witness our hands and seals.

Test;- John Myer.

Simon P. Eppard (seal)

Effie M. Eppard (seal)

State of Maryland, Frederick County, to-wit;-

I do hereby certify that on this 27th day of November in the year Eighteen Hundred and Eighty two, before me the subscriber a Justice of the Peace, in said State in and for said County, personally appeared Simon P. Eppard and his wife, Effie M. Eppard of said County and did each acknowledge the foregoing deed to be their respective act.

John Myer J.P.

State of Maryland, Frederick County, to-wit;-

I hereby certify that the foregoing is a true copy of the original Deed from Simon P. Eppard & Effie Eppard, his wife to Joshua Longman, as recorded in Liber No. 346 Folio 311 one of the Land Records of Frederick County, Maryland.



In Testimony Whereof, I hereunto subscribe my name and affix the seal of the Circuit Court for Frederick County, at Frederick, Md, this 9th day of April A. D. 1924.

Eli G. Haugh

(Filed April 29, 1924)

Clerk of the Circuit Court for Frederick County, Maryland