

TO THE HONORABLE, THE JUDGES OF SAID COURT:-

The Bill of Complaint of Elmer U. Heffner and Dorothy Heffner, his wife, Luther Heffner and Elizabeth Heffner, his wife, Della L. Main and Charles F. Main, her husband, Amanda A. Koogle and Frederick M. Koogle, her husband, Maud M. Myers and Charles B. Myers, her husband, Nettie J. Little (widow), Frank L. Heffner and Gertrude Heffner, his wife, William S. Heffner and Maggie M. Heffner, his wife, Mary Ellen Haugh and Milard Hamelton Haugh, her husband, Clayton E. Heffner and Minnie H. Heffner, his wife, Sally J. Heffner, (widow), Walter H. Heffner and Blanche A. Heffner, his wife, Staley G. Heffner and Vernie Heffner, his wife, Lillie Gordon and R. Nevin Gordon, her husband, Ruth Stine and William Stine, her husband, Elsie G. Gross and Leslie G. Gross, her husband, Mary Heffner (unmarried), and Erma V. DeGrange and Thomas F. DeGrange, her husband, respectfully shows unto your Honors:-

1. That Lulu Heffner, Late of Frederick County, deceased, died on or about the 6th day of January, 1932, intestate, and left surviving her no descendants, but the following heirs at law: Elmer U. Heffner, whose wife's name is Dorothy Heffner, Luther Heffner, whose wife's name is Elizabeth Heffner, Della L. Main, whose husband's name is Charles F. Main, Amanda A. Koogle, whose husband's name is Frederick M. Koogle, Maud M. Myers, whose husband's name is Charles B. Myers, Erma V. DeGrange, whose husband's name is Thomas F. DeGrange, Nettie J. Little, (widow), Frank L. Heffner, whose wife's name is Gertrude Heffner, William S. Heffner, whose wife's name is Margaret Heffner, Mary Ellen Haugh, whose husband's name is Milard Hamelton Haugh, Clayton E. Heffner, whose wife's name is Minnie H. Heffner, all being children of Lewis Heffner, who was a brother of John P. Heffner, the father of the decedent, Lulu Heffner; Walter H. Heffner, whose wife's name is Blanche A. Heffner, Staley G. Heffner, whose wife's name is Vernie Heffner, Lillie M. Gordon, whose husband's name is R. Nevin Gordon, Mary Heffner, (unmarried), Ruth E. Stine, whose husband's name is William Stine, Elsie G. Gross, whose husband's name is Leslie G. Gross, being the widow and children of John H. Heffner, who died on or about the 7th day of February, 1925, and the said John Heffner being a son of the aforesaid Lewis Heffner, Bertha A. Rice, (widow), and Thomas Rice, whose wife's name is Gertrude Rice, Earl Rice, Thomas Rice, Austin Rice, and Bertha Rice, being the wife and children of Walter Rice, who was the only child of Levin T. R. Rice, who was a brother of Pheobe Heffner, the first wife of John P. Heffner, and, therefore, an heir of the said Lulu Heffner. That all of the aforementioned persons are adults with the exception of Bertha Rice, who is fourteen years of age; and that the aforementioned defendants are all residents of Frederick County.

2. That the said Lulu Heffner died, seized and possessed of all the following pieces or parcels of land, situate, lying and being in Frederick County, in the State of Maryland, subject, however, to the life estate, in one-third thereof, of the Defendant, Sarah E. Heffner.

A. All that piece or parcel of land containing 165 acres of land, more or less, situate, lying and being South of Jefferson, in the County and State aforesaid, which was conveyed unto John P. Heffner by Thomas A. Johnson and W. Clinton Adams, Executors, by deed dated April 21, 1888, and recorded in Liber W.I.P. No. 6, Folio 202, one of the Land Records of Frederick County.

SAVING AND EXCEPTING, However, therefrom all the following two pieces of land,

1. One-half acre conveyed by John P. Heffner and Sarah E. Heffner, his wife, to Dr. H. B. Gross, by deed dated October 19, 1893, and recorded in Liber J.L.J. No. 5, Folio 341, one of the Land Records of Frederick.

2. One-half acre of land conveyed unto H. Hammond Gross, by John P. Heffner and Sarah E. Heffner, his wife, by deed dated March 9, 1896, and recorded in Liber J.L.J. No. 1, Folio 630, one of the Land Records of Frederick County,

The aforementioned deeds are filed herewith, and it is prayed that they may be taken as a part hereof, marked as Exhibits Nos. 1, 2 and 3, respectively.