

Charles F. Smith, Jr., and  
Harriet A. Smith, his wife

Vs.

Edward Hobbs Smith and  
Charles Jackson Smith, infants

" " No. 19145 Equity.  
" " In the Circuit Court  
" " for Frederick County.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The bill of Complaint of Charles F. Smith, Jr., and Harriet A. Smith, his wife, respectfully represents unto your Honorable Court:

FIRST: That on the 26th day of May, 1952, a certain Helen F. Mock unmarried, conveyed two tracts or parcels of land unto Juliet G. Smith and Charles F. Smith, Jr., as tenants in common, by deed recorded in Liber No. 403, folio 300 &c., one of the Land Records for Frederick County.

SECOND: That the said Juliet G. Smith, deceased, by her first Codicil to her last Will and Testament, and dated February 11, 1952, and recorded in Liber H. D. R. No. 3, folio 344, one of the Will Records for Frederick County, devised her undivided one-half interest in said real estate to Margaret G. Boyle, for life, and upon her death, devised said real estate to her two grandsons, Edward Hobbs Smith and Charles Jackson Smith; That the said Margaret G. Boyle, by her deed dated the \_\_\_\_\_ day of December, 1958, and intended to be recorded among the Land Records for Frederick County, conveyed all her right, title and interest in said real estate, to Charles F. Smith, Jr.,

THIRD: That the said Edward Hobbs Smith and Charles Jackson Smith are infants, under the age of twenty-one years.

FOURTH: That on the \_\_\_\_\_ day of December, 1958, your Petitioners, Charles F. Smith, Jr., and Harriet A. Smith, his wife, together with Edward Hobbs Smith and Charles Jackson Smith, both unmarried, entered into a contract and agreement with Roger C. Lindsay and Helen M. Lindsay, his wife, for the sale of the above mentioned real estate, being two parcels of land located in Libertytown, Frederick County, Maryland, and known as Lots Nos. 13, 14, 15 and 16 on the Plat of Libertytown, at and for the sum of SIXTY-EIGHT HUNDRED FIFTY (\$6850.00) DOLLARS, which sum is an excellent price for said real estate, and your Petitioners aver it would be to the best interest and advantage of the owners of said property and especially the infant defendants, to have the contract and sale ratified and confirmed by