

WALTER E. KEENEY
Route #1
Frederick, Maryland

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vs.

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NO. 21,950 EQUITY

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LULA I. EICHELBERGER, Widow
Route #1
Thurmont, Maryland

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IN THE CIRCUIT COURT FOR

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FREDERICK COUNTY, MARYLAND

and

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PAULINE E. KEENEY KEGLEY and
JAMES KEGLEY, her husband
Route #1
Thurmont, Maryland

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BILL FOR PARTITION OF REAL ESTATE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Walter E. Keeney, by William W. Wanner, and Rollins and Wanner, and E. Austin James, his Solicitors, respectfully shows unto your Honors:

FIRST: That the Complainant and the Respondents are adults, sui juris, and reside in Frederick County, Maryland, where they have resided for more than two years last past.

SECOND: That the Complainant and the Respondents, Lula I. Eichelberger and Pauline E. Keeney Kegley, acquired title to the hereinafter real estate by a deed from I. Mary Staley, Unmarried, as joint tenants, and not as tenants in common, which said deed was dated July 31, 1954, and is recorded among the Land Records of Frederick County, Maryland, in Liber 533, Folio 585; a certified copy of said deed being filed herewith and marked "Complainant's Exhibit A" which is prayed to be taken as a part hereof; that the Complainant and the Respondent, Pauline E. Keeney Kegley, at the time of the aforesaid conveyance were lawfully married, which said marriage was terminated by a divorce A VINCULO MATRIMONII which was granted by your Honors in No. 18,345 Equity, in the Circuit Court for Frederick County, Maryland, a certified copy of said Divorce Decree being filed herewith and marked "Complainant's Exhibit B", which is prayed to be taken as a part hereof; that since the aforesaid Decree, the Respondent, Pauline E. Keeney Kegley has intermarried with James Kegley, one of the Respondents herein.