

C. A. Lawrence Downey

No. 12,392 Equity.

On

In the Circuit Court for Frederick

Petition.

County, in Equity.

To the Honorable, the Judges of said Court:

The Petition of Edward J. Smith, surviving trustee in the above cause respectfully shows unto your Honors:

1st. That Ernest A. Lawrence, late of Frederick County, Maryland, died December 27, 1930, leaving a last Will and Testament which was admitted to probate by the Orphan's Court for Frederick County, December 30, 1930, and recorded in Liber C. H. B. No. 1, folio 341, one of the Will Records for Frederick County. That in his will the said Ernest A. Lawrence appointed the Central Trust Company of Maryland his executor and trustee, as will more fully appear by reference to a certified copy of said will, filed in this cause as "Exhibit E. A. L."

2nd. That upon the failure of the Central Trust Company C. A. Lawrence Downey and your petitioner were appointed substituted trustees by an order of your Honorable Court passed in this cause May 4th. 1932. That the said C. A. Lawrence Downey died November 29, 1939 and since then your petitioner has administered said trust as surviving trustee, under the direction and guidance of your Honorable Court.

3rd. That your petitioner holds as a part of the corpus of the first trust in this cause three farms situated in Linganore and Woodville Districts, in Frederick County. That one of said farms is known as the "Far Farm", contains 129 acres, 1 rood and 34 square perches of land, is situated about three miles from Unionville on a County dirt road and in an undersirable location. That said farm is improved by an old five room dwelling house, frame construction, bank barn, corn house, hog house and chicken house. That for the past two years said farm has not been tenanted and your petitioner has been unable to rent it. That when said farm was rented in former years it proved to be unprofitable and has been a continuous drain upon the trust estate. That your petitioner believes and alleges that it will be to the benefit and advantage of the trust estate to offer said farm for sale at public sale, and if a satisfactory price can be obtained, sell the same, subject to the approval of your Honorable Court.