

MARIE DORSEY  
1126 MYRTLE AVENUE  
BALTIMORE, MARYLAND 21201

\*IN THE  
CIRCUIT COURT

HELEN WILLIAMS  
1126 MYRTLE AVENUE  
BALTIMORE, MARYLAND 21201

\*FOR  
FREDERICK COUNTY

RUBY DIGGS  
ROUTE 6, BOX 326  
FREDERICK, MARYLAND 21701

\*

*No. 31,110 Equity*

PEARL DIGGS  
ROUTE 6, BOX 327  
FREDERICK, MARYLAND 21701

\*

Plaintiffs\*

vs.

MABEL GARDINER  
2617 MAISEL STREET  
BALTIMORE, MARYLAND 21230

\*

Defendant .

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BILL OF COMPLAINT FOR PARTITION

Now comes Marie Dorsey, Helen Williams, Ruby Diggs and Pearl Diggs, Plaintiffs, by Milton Kaplan, their attorney and respectfully state:

1. That all parties in this suit are sisters.

2. That the parties inherited Real Estate from their late father, Charles A. Dorsey, which is the subject of this suit and which lies in Frederick County, in Woodville #18 Election District.

3. That the said Real Estate is improved by a vacant small concrete block home with approximately 2.40 acres more or less fronting on Woodville Road (see attached title report prepared by Frederick Title Company).

4. That the said Real Estate is not susceptible of division and partition may be had only by a sale of the property and a division of the proceeds.

5. That the Plaintiffs have made repeated efforts to persuade the Defendant to sell the property and to divide the proceeds equally, each having a 1/5 interest therein, however the Defendant has refused and still refuses to join in to sell the said property.

*B. City*