

No. 4312 Equity.

Bill of Complaint

Eliza C. Lewis, Guardian & Next friend of Ezra C. Eader, Charles C. Eader & Ada M. Eader vs. Ezra C. Eader and others.

No. 4312 Equity.

In the Circuit Court for Frederick County sitting as a Court of Equity.

Exhibit No. 1

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity. The Bill of Complaint of Eliza C. Lewis, Guardian and next friend of Ezra C. Eader, Chas. C. Eader and Ada M. Eader of Frederick County, respectfully shows unto your Honors, that the said Ezra C. Eader, Chas. C. Eader and Ada M. Eader, together with Willie M. Eader and Annie C. Eader are the owners as tenants in common of a house and lot on East Street in Frederick City, Maryland, being the same property conveyed to them the said Ezra C. Eader, Chas. C. Eader, Ada M. Eader, Willie M. Eader and Annie C. Eader, by Ann C. Eader, the mother of said tenants in common (now deceased) by deed dated the 15th day of June, A.D. 1874, a certified copy of which is filed herewith marked Exhibit No. 1. and which with all other Exhibits herewith filed is prayed to be taken as part of this bill of Complaint as fully as if here inserted in words and figures; that all of said tenants in common are infants and reside in Frederick County and it would be for the benefit and advantage of all of said infants for said real estate to be sold and the proceeds invested for their benefit, and said real estate will not admit of division among said tenants in common without injury & loss. In tender consideration whereof and for that your Complainant is remediless in the premises by the strict rules of the Common law and redressable only in a Court of Equity where matters and things of this nature are properly cognizable - To the end therefore that the said Ezra C. Eader, Chas. C. Eader, Ada M. Eader, Willie M. Eader and Annie C. Eader, may answer the premises fully and particularly and that said real estate may be sold as prayed, and your Complainant may have such other & further relief in the premises as the nature of the case may require and to your Honors shall seem just, may it please your Honors to grant to your Complainant the State of Maryland's writ of Subpoena, directed to said Ezra C. Eader, Chas. C. Eader, Ada M. Eader, Willie M. Eader and Annie M. Eader, directing and commanding them to be and appear in your Honorable Court on some certain day to be therein named to answer the premises and abide by and perform such Order or decree as your Honors shall seem right, and as in duty bound I will ever pray &c.

Subple