No. 4655 Equity

Hiram J. Grove and wife et al vs Daniel R. Grove et al	No Equity In the Circuit Court for Frederick County sitting as a Court of Equity.

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity,

Humbly Complaining

Bill of Complaint

Sheweth unto your Honors Your Orator Hiram J. Grove, and Anna Mary Grove his wife and your Oratrix Alma C. D. Lighter, who being an infant under the age of twenty-one years by leave of the Court here sues by her prochein amy Sara Grove, that heretofore certain Martin S. Grove, late of Frederick County, wherein your Orator and Oratrix also reside, was possessed of a large tract of valuable real estate lying and being in said County and conveyed by sundry deeds hereafter referred to, to him, aggregating in all about Two hundred and twenty acres of Land, more or less, which said land is fully described in a Deed from Richard J. Bowie and John Brewer Trustees to said Martin S. Grove dated February the twenty-second, Eighteen hundred and fifty-two and duly recorded in Liber E.S. No. 4 folio 428, one of the Land Records of Frederick County aforesaid and in a deed of Conveyance from George Shafer and wife to said Martin S. Grove dated August twenty-eighth Eighteen hundred and fifty-five and duly recorded in Liber E.S. No 8, folio 8, one of the Land Records of said County, as will appear by reference to duly certified copies thereof herewith filed, marked respectively Exhibits A & B, and which as well as all other Exhibits hereinafter exhibited are prayed to be taken and considered as a part of this Bill of Complaint, as fully as if herein at large in words and figures set forth.

That the said Martin S. Grove being so possessed and seized of the said land in said deeds described, departed this life recently seized and possessed thereof, intestate and without any last will and testament, and without having disposed of said Land.

That the said Martin S. Grove left surviving him as his heirs at Law and next of kin the following named parties, viz

1 Sara Grove, widow of said Martin S. Grove
2 Hiram J Grove, your Orator, a son, married to Anna Mary Grove
3 Charlotte C. Whips a daughter, intermarried with Daniel P Whips.
4 Charles H Lighter, husband of Virginia E Lighter a deceased daughter.
Edward M. L. Lighter a son of Virginia E. Lighter a deceased daughter
the said Alma C. D. Lighter an infant and a daughter of the said Virginia E Lighter, a deceased daughter
5 Daniel R Grove, married to Julia Grove
6 Martin M. Grove, married but whose wifes name is unknown.
7 Louisa E. Thomas a daughter intermarried with Zachariah G Thomas.

Your Orator and Oratrix charge that said property is not susceptible of division or partition amongst the parties entitled thereto, and that it will be to the interest and advantage of all parties interested therein, both infants and adults that the same be sold & the proceeds be divided between them according to their respective interests.

Your Orator and Oratrix further charge that the said Martin M. Grove and his wife, whose name is unknown are non-residents of the State of Maryland, and do not reside therein, and that the said Daniel R. Grove and Julia Grove his wife reside in Washington