No. 4883 Equity

To the Honble the Judges of the Circuit Court for Frederick County
Sitting in Equity.

Humbly complaining, showeth unto your Honors, Your Orator J. Edward Doll & your Orator Mary E. Doll his wife by J. Edward Doll her next friend and your Orator Jane Keefer, that heretofore to wit: On or about the day of 18 a certain Margaret Keefer died intestate, seized & possessed of certain real estate lying & being situate in the City of Frederick, in said County, State of Maryland more particularly described in a certain deed from Philip Lowe to Margaret Keefer dated & recorded in Liber W.B.T. No 6. folio 577 &c. one of the Land Records of said County, as will appear reference being had to said deed, a certified copy whereof is herewith filed & marked Exh^t A. which together with all other Exhibits is prayed to be taken as part of this bill of Complaint.

Your Orator & Oratrices further show unto your Honors that the said Margaret Keefer left her surviving the following Children to whom said real Estate descended as her heirs as tenants in common to wit: Frederick Keefer and John Keefer. that sometime in the month of December 1873 the said John Keefer died leaving an only child Mary E. Keefer, who afterwards intermarried with the said J. Edward Doll & a widow Jane Keefer that the said John Keefer left a last will & testament, duly executed to convey real & personal estate and duly admitted to probate, which will unrevoked & in full virtue & force in law, whereby he devised to his widow, the said Jane Keefer all his real & personal Estate during her widowhood, and in the event of her marriage, then the same to his said daughter Mary E. Keefer (now Doll), all of which will more fully appear reference being had to said will now on record in the office of the Register of Wills of Frederick County aforesaid a certified copy whereof is herewith filed & marked Exhibit B. that the said widow Jane Keefer is still living & unmarried, and that the said Mary E. Keefer is now intermarried with the said J. Edward Doll.

Your Orator & Oratrix further show unto your Honors that on the 7th day of October 1881 the said Frederick Keefer, Jane Keefer, J. Edward Doll and Mary E. Doll conveyed said real Estate to Francis Brengle Esq by deed of Mortgage to secure the payment of the sum of Nine hundred dollars, which said mortgage bears interest from date, and that all the principal secured thereby, together with the interest is still due and unpaid. that afterwards to wit on the 14th of July 1880 the said Jane Keefer, J. Edward Doll and Mary E. Doll, conveyed their interest in and to said real Estate by of Mortgage to George Cramer, to secure the sum of One hundred & fifty dollars with interest from date: and that subsequently the said George Cramer assigned said mortgage to said Francis Brengle and that the principal & interest of said mortgage is still due and unpaid all of which will appear reference being had to said Mortgages, certified copies whereof are hereby filed and marke respectively "C" & "D"

Your Orator & Oratrices further represent unto your Honors that the said Francis Brengle is willing that said real estate should be sold & the amount due on his said mortgages for principal & interest should be paid out of the proceeds of said sale & that the purchaser should take said real estate free & clear of the liens of said mortgages & they further represent that the said real estate is not susceptible of an advantageous division and that the same cannot be divided without loss or injury to the parties interested in the same

To the end therefore that the said Frederick Keefer and Francis Brengle may answer the premises and that the said real estate may be sold & the proceeds divided among the parties in interest needes the direction of your Hon Court & that your Orators may have such further & other relief as their case may require, may it please your Honors to grant the writ of Subpoena to be directed to the said Frederick Keefer & Francis Brengle com-

Exhibit A