No. 6512 Equity.

Brown is also desirous that said Real Estate shall be sold and is willing to accept such amount in lieu of his estate by the entirety in the one half of said real estate, as may be allotted unto him by the rules of your Honorable Court, the said Charles E. Brown now being about 35 years of age.

9. That the said real Estate is not susceptible of partition or division among the parties who have title to the same, without great loss and injury.

10. That it would be to the interest and advantage to all the parties with title in said real estate that the same should be sold by a Trustee to be appointed by your Honorable Court and the nett proceeds divided among the parties interested in such share as they are respectively entitled.

11. That at the time of her death the said Ann R. Mont with said husband, George W. Mont, was indebted unto George Geesey of Frederick County, Maryland, in the sum of $250.00 as evidenced by the joint promissory note of said Ann R. Mont and George W. Mont to said Geesey, which said note has never been paid as the said Ann R. Mont left no personal property sufficient to pay said indebtedness, and said indebtedness is now a lien on the said real Estate as described in "Exhibit A." as descended to the heirs at law of said Ann R. Mont, and which said indebtedness your Orators and the said George W. Mont are desirous shall be paid out of the proceeds of the sale of said real Estate.

Your Orators, therefore, pray your Honors for the following relief:—

1. That the real Estate mentioned in "Exhibit A" may be decreed to be sold by a Trustee appointed by your Honorable Court, and that the nett proceeds of sale may be brought into this Court for the payment in the first place, of the Note due by the said estate of Ann R. Mont unto George Geesey, and the residue may be distributed among the parties to this Cause as their interest and title may appear.

That your Orators may have such other and further relief to which they may be entitled, and as your Honors will seem to be right and equitable.

May it please your Honors to grant unto your Orators the writ of Subpoena directed unto the said Willie Lee Brown and Franklin Edward Brown, infants, and unto Charles E. Brown, a adult, defendants, all residing in Frederick County, State of Maryland, Commanding them and each of them to be and appear in your Honorable Court on some certain day to be named therein, and to answer this Bill of Complaint, and to abide by and perform such Decree as may be passed in this Cause.

And as in duty bound, etc.

Jacob Rohrbaugh
Solicitor for Plaintiffs

Filed Feby 12th 1896.

Exhibit "A"

Subpoena