

Bill of Complaint

No. 7420 Equity.

Minnie Oden and William G.
Oden, her husband,
Plaintiffs.

James H. Poole and Estelle
his wife, Alberius Poole and
- Poole, his wife, Hattie
Smith and George Smith, her hus-
band, and Annie May Hargett,
wife of Charles N. Hargett. Mort-
gages,
Defendants.

No. 7420 Equity.

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

To the Honorable the Judges of said Court:-

The Bill of Complaint of Minnie Oden and William G. Oden, her husband of Frederick County, State of Maryland, respectfully shows unto your Honors:-

1. That Samuel H. Poole late of Frederick County, Maryland, deceased, was in his life time, seized and possessed of certain real estate situate, lying and being in the village of Spangville in said County and State which was conveyed to said Samuel H. Poole by two deeds, one from Joel H. Riggs and wife dated May 12th 1875, and one from John T. Williams and wife dated June 19th 1884, said deeds being recorded among the Land Records of said Frederick County, respectively in Libers T. H. No. 2 folio 366 and A. D. No. 9 folio 192 certified copies of which deeds are herewith filed as part hereof marked respectively "Exhibit A." and "B."
 2. That on the 25th day of January 1887 said Samuel Poole executed a mortgage upon said Real Estate mentioned in "Exhibit A." to one Charles N. Keller for the sum of \$200, which said mortgage on the 10th day of April 1895 was duly assigned to Annie M. Keller, now Annie May Hargett of Charles N. Hargett, and with certain interest, remains due and unpaid a certified copy of which mortgage is herewith filed as part hereof marked "Exhibit C."
 3. That being so seized and possessed said Samuel H. Poole departed this life intestate on the 10th day of September, inst (1901) leaving surviving him a brother, James M. Poole who is intermarried with Estelle Poole, his wife, and the following nephews and nieces children of deceased brother John M. Poole to whom said real estate has descended.
 - (1) Your orator, a niece, Minnie Oden who is intermarried with William G. Oden her husband,
 - (2) The defendant a nephew Alberius Poole who is intermarried with Poole's wife
 - (3) The defendant, a niece, Hattie Smith who is intermarried with George Smith, her husband,
 - (4) That said brother, as well as said nephews and nieces with their husbands and wives are all adults over 21 years of age and all reside in Frederick County, Maryland, except said Alberius Poole and wife who are non residents of the State of Maryland, and residents of the State of West Virginia.
 5. That said real estate will not admit of being divided among the parties entitled thereto as aforesaid without loss and injury. Your orators therefore invoke the aid of your Honorable Court.
- And your orators pray for the following relief: -

Exhibit