

No. 7574 Equity,

Bill of Complaint

The Bill of Complaint of Charles Daniel Croone and Jacob Keefer Croone, infants residents of Frederick County, Maryland, by their next friend John C. Croone, respectfully represent unto your Honors:-

First,

That the said Complainants, Charles Daniel Croone and Jacob Keefer Croone and the defendants, Anna Catharine Croone and Samuel Lewis Croone are all infants under the age of twenty one years residing in Frederick County and that they are children of Charles M. Croone late of Frederick County deceased,

Second,

That the said Complainants and defendants are the owners in fee simple of a lot or parcel of ground containing one acre, more or less, which was conveyed unto them by and executed by their said father Charles M. Croone, bearing date September 11th A.D. 1891, and duly recorded in Liber N. P. No 13 folio 598 one of the Land Records for Frederick County, as will appear by reference to the original deed conveying said property which is filed herewith as a part hereof marked exhibit "A" which together with all other Exhibits herewith filed it is prayed may be taken and considered as a part of this Bill of Complaint, said property mentioned in Exhibit "A" being situated in Frederick County, Maryland,

Third, That the Land mentioned and described in Exhibit "A" is not susceptible of division among the parties thereto entitled and is constantly depreciating in value and that it would be to the interest and advantage of all the infants having interest therein to have the same sold under a decree of your Honorable Court and the proceeds of sale divided among the parties thereto entitled according to their respective rights and interests.

To the end therefore,

(a) That the land mentioned in Exhibit "A" may be sold under a decree of your Honorable Court and the proceeds of sale divided among the parties thereto entitled as set forth in said Bill of Complaint;

(b) And that your complainants may have such other and further relief as the nature and equity of their case may require,

May it please your Honors to grant unto your complainants the writ of Subpoena in the usual form directed to the Sheriff of Frederick County against the said Anna Catharine Croone and Samuel Lewis Croone both of whom are infants residing near Middletown, Frederick County, Maryland commanding them and each of them to be and appear in your Honorable Court on some day certain to be named therein to answer the premises and to abide by and perform such decree as may be passed herein,

And as in duty so,

Ernest S. Koblenz  
John C. Motus

Solicitors for Complainant.

Filed Dec. 29 1902.

Exhibit

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