

No. 7398 Equity.

Bill of Complaint

in Frederick County, Maryland, an adult daughter Lela E. who intermarried with William B. Dorsey both of whom reside in Howard County, Maryland, an adult Lela E. who intermarried with William B. Dorsey both of whom reside in Howard County, Maryland, an adult daughter Emma E. who intermarried with Raymond Remmberger both of whom reside in the City of Washington, District of Columbia, and adult daughter Arabella, who intermarried with Charles McDreyer and who reside in Frederick County, Maryland, and the following infant children Edward H. Cecil, Nellie B. Cecil and Minnie E. Cecil who are unmarried and under the age of twenty one years and reside with their mother in Frederick County, Maryland,

That the said Christopher C. Cecil being indebted unto the defendant Grafton B. Hammond in the sum of two thousand dollars upon his promissory note dated March 31st 1899, payable two years after date, for the purpose of securing said promissory note, executed in conjunction with his wife, the said Mary E. Cecil, a mortgage covering the said lands described in Exhibit "A" as will appear by reference to a certified copy of said mortgage filed herewith and marked Exhibit "B."

That upon the death of the said Christopher C. Cecil, intestate the property described in Exhibit "A" descended to and vested in his children hereinafter named as coparceners subject to the dower right of their mother the said Mary E. Cecil and subject also to the mortgage, described in Exhibit "B"

That the said real estate mentioned in Exhibit "A" is not susceptible of partition or division among the parties entitled to interest therein without material loss and injury and it would be to the interest and advantage of all the parties that said real estate be sold and the proceeds thereof divided among the parties thereto entitled according to their respective rights and interests.

To the end therefore -

- (a) That a decree may be passed for the sale of said real estate,
- (b) That the proceeds of said sale after the payment of costs, expenses and incumbrances may be distributed among the parties thereto entitled according to their respective rights and interests,
- (c) 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 against the said Mary E. Cecil, widow and Edward H. Cecil, Nellie B. Cecil and Minnie E. Cecil, infant and Grafton B. Hammond, mortgage, all of whom reside in Frederick County, Maryland, commanding them and each of them to be and appear in this Court on some day certain day to be named therein to answer the premises and to abide by and perform such decree as may be passed therein.

And as in duty so,

Emory S. Coblenz
Charles C. Hales
Solicitors for Complainant

Filed July 25 1901

Maryland
Harold
daughter
resides