

No. 6054, Equity.

Bill of Complaint.

Filed Dec. 28-1892.

Rosa E. Lelievre

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Laura A. Boker  
Walter A. Lelievre  
Olmaney Lelievre  
Bertha E. Lelievre

No. 6054, Equity.

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

To the Honorable the Judge of said Court:  
The Bill of Complaint of Rosa E. Lelievre, adult over the age of twenty one years of Frederick County in the State of Maryland. Plaintiff against Laura A. Boker and Walter A. Lelievre, Olmaney Lelievre, and Bertha E. Lelievre infants all of said County defendants. in your Honorable Court exhibited respectfully shows unto your Honor:

1st

That a certain tract, part or parts of a tract, piece or parcels of land containing fifty-five acres, two rods and thirty six perches of land more or less situated in Frederick County State of Maryland was conveyed to your Oratrix and the parties herein named as defendants as tenants in common subject to a life estate therein to their mother Harriet A. Lelievre for and during the term of her natural life by one Jasper Albaugh trustee in No 4889 Equity Case in your Honorable Court by deed duly recorded among the Land Records for said County a duly Certified Copy of which is herewith filed as part herof and marked Exhibit No. 1.

2d

That on or about the 9th day of March in the year 1891 the said Harriet A. Lelievre and George H. Lelievre her husband, by their duly recorded among said Land Records conveyed the said life estate of said Harriet A. Lelievre in and to said land to your Oratrix the said Rosa E. Lelievre as will appear by a duly Certified Copy of said last mentioned deed herewith filed as part herof and marked Exhibit No. 2.

3d

That said land is still owned and held by said defendants herein named and your Oratrix as tenants in common subject to said life estate now owned by your Oratrix.

4th

That all of said parties in interest in said lands herein named as defendants are infants under the age of twenty one years except the said Laura A. Boker who is a widow over the age of twenty one years and all of them are residents of Frederick County aforesaid.

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That your Oratrix and said parties defendant are without the means requisite to operate and farm said lands, to buy or to buy the necessary fertilizers, used in tenant farming and

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