

No. 6453, Equity.

Bill of Complaint.

Filed Sept. 10th. 1895.

Joseph G. P. Shroyer and  
Ellen Shroyer his wife,  
Plaintiffs.

No. 6453, Equity  
In the Circuit Court  
for Frederick County,  
as a Court of Equity.

(10)  
Charles F. Shroyer and  
Shroyer his wife, Cornelia  
Ann Shroyer, Elizabeth  
M. Smith and John W.  
Smith her husband, John  
Thomas Shroyer and  
Shroyer his wife, Rebecca  
Welcum and Peter Welcum  
her husband,  
Defendants

To the Honorable the Judge of Said Court:-  
The Bill of Complaint of Joseph G. P. Shroyer and  
Ellen Shroyer his wife of Frederick County, respectfully  
states,

1. That a certain Ann Rebecca Shroyer late of  
Frederick County, departed this life ditto in or  
about the year Eighteen Hundred and Seventy-eight.
2. That Said Ann Rebecca Shroyer left surviving her  
a husband, John Shroyer who died in or about the  
year Eighteen Hundred and Ninety-two, and the following  
heirs at law, namely, a son Charles F. Shroyer who  
is married and the Christian name of whose wife is  
unknown to your Complainants, both of whom are adults  
non-residents of the State of Maryland and said to  
reside in the State of Indiana, a daughter Cornelia  
Ann Shroyer who unmarried an adult residing in  
Frederick County; a son Joseph G. P. Shroyer who is married  
and the name of whose wife is Ellen Shroyer both of  
whom are adults residing in Frederick County and are the  
Complainants in this case, and a daughter Elizabeth  
M. now the wife of John W. Smith both of whom are  
adults residing in Frederick County.
3. That Said Ann Rebecca Shroyer was at the time  
of her death seized and possessed of valuable real  
estate situated in Frederick County described in three  
deeds, Certified Copies whereof are herewith filed as  
part hereof marked respectively Exhibits Nos. 1, 2, and  
3.
4. That Said real estate cannot be divided without  
loss or injury to the parties interested.