

EQUITY NO. 8639.

Virgie V. Warrenfeltz and Marshall H. Warrenfeltz, her husband; Myrtle I. Koogle and Edward L. Koogle, her husband, Floyd E. Betts and Eva B. Betts, his wife; Grace E. Schildtknecht and Clifford N. Schildtknecht her husband.

No. 8639 Equity.

In the Circuit Court for Frederick County, sitting

VS.

as a Court of Equity.

Annie N. Betts, widow of Josiah Betts, and German B. betts, infant.

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity.

The Bill of Complaint of Virgie V. Warrenfeltz and Marshall E. Warrenfeltz, her husband; Myrtle I. Koogle, and Edward L. Koogle, her husband; Floyd E. Betts, and Eva B. Betts, his wife; Grace E. Schildtknecht and Cliffore N. Schildtknecht her husband, all of whom are residents of Frederick County except the complainants, Myrtle I. Koogle and Edward L. Koogle, her husband, who reside in Washington County, Maryland, respectfully represents unto Your Honors--

First--That Josiah Betts, late of Frederick County, but now deceased, was in his lifetime and at the time of his death seized and possessed of certain real estate situated in what is known as Pleasant Walk, in Frederick County, Maryland, containing in the aggregate about eleven acres of land more or less, which was conveyed to the said Josiah Betts by the following deeds--

(a) By deed from Jacob Dusing and Nannie Dusing his wife, bearing date April 2nd 1887, and duly recorded among the land records of Frederick County, conveying one acre of land more or less.

(b) By deed from Daniel A. Gernand dated April 2nd 1888, conveying 13 5/8 acres of land more or less.

(c) By deed from Thomas S. Dusing and Elmira V. Dusing, bearing date March 22 1888, conveying 4 3/4 acres, more or less.

All of which will more fully appear by reference to certified copies of said deeds marked exhibits A B & C, respectively, which together with all other exhibits herewith filed, it is prayed may be taken and considered as a part of this Bill of Complaint.

(d) The said Josiah Betts, in his lifetime sold from the land mentioned in Exhibit B 8 1/2 acres to Samuel L. Betts, as will more fully appear by certified copy of deed from Josiah Betts and wife to the said Samuel L. Betts, bearing date April 10 1888, and filed herewith marked Exhibit D.

Second. The said Josiah Betts having been seized and possessed of the aforesaid land, departed this life intestate on or about the 19th day of September A. D. 1902 leaving surviving him a widow, Annie N. betts, who is one of the defendants in this case, and the following children children to wit--

Virgie W. an adult daughter who intermarried with Marshall H. Warrenfeltz; Myrtle I., an adult daughter who intermarried with Edward L. Koogle; Floyd E. an adult son whose wife's name is Eva B. betts; Grace E. an adult daughter, who intermarried with Clifford N. Schildtknecht; and Gorman B., an infant who is about thirteen years of age.

All of the aforesaid children together together with their respective wives and