

## EQUITY NO. 9160.

Jesse J. Plummer and Edith May Plummer,  
his wife

to

Samuel W. Plummer and Mollie E. G. Plummer  
his wife and Charles Plummer.

No. 9060 Equity.

In the Circuit Court for  
Frederick County, Maryland, sitting  
as a Court of Equity.

To the Honorable, the Judges of the Circuit Court for Frederick County, Maryland, setting as a  
Court of Equity--

Your orators complaining say--

1. That they are residents of Berger County, in the State of New Jersey.
  2. That Your orator Jesse J. Plummer, is a brother of Anna W. Plummer, who married a certain Edward W. Plummer.
  3. That the said Anna W. Hughes died on the date November 9th, in the year 1907, in Frederick County, in the State of Maryland, intestate, and without leaving any child or children surviving her.
  4. That Edward W. Hughes, the husband of the said Anna F. Hughes died on the date November 15th in the year 1914, in the State of Kansas where he then resided.
  5. That at the time of the death of the said Anna W. Hughes she left surviving her your Orator, Jesse J. Plummer, Samuel W. Plummer, a brother, who is married to Mollie E. G. Plummer, both of whom now reside in Frederick County, Maryland; and Charles Plummer, a brother, who is now a widower, and whose place of residence is now unknown unto your orators; your orator, Jesse J. Plummer, and the defendants Samuel W. Plummer and Charles Plummer, being the only and nearest relatives surviving the said Anna W. Hughes.
  6. That at the time of her death the said Anna W. Hughes was seized and possessed of a certain parcel of real estate containing about  $47\frac{1}{2}$  acres of land, lying and being in New Market District in Frederick County Maryland, and being the same real estate as described in the deed from Mary W. Plummer to Anna W. Hughes, by her then name of Anna W. Plummer, dated October 30th 1883, and recorded in liber A. F. No. 7 folios 526 Etc., one of the land records of Frederick County Maryland, a duly certified copy of which said deed is herewith filed as a part hereof and marked Exhibit A., save and excepting thereout and therefrom the real estate described in the deed from Anna W. Hughes and Edward W. Hughes, her husband, to Berthiar C. Frizzell, dated October 1st, 1888 and recorded in liber W. P. P. No. 6 folio 477, one of the land records of Frederick County, Maryland, a duly certified copy of which said deed is herewith filed as a part hereof and marked Exhibit B.
  - 7.--That your orator Jesse L. Plummer and the defendants Samuel W. Plummer and Charles Plummer are now seized and possessed as tenants in common of the said real estate containing about  $47\frac{1}{2}$  acres of land of which the said Anna W. Hughes died, seized and possessed, and in and to which said Edward W. Hughes had a life estate from the time of the death of the said Anna W. Hughes to the time of the death of the said Edward W. Hughes.
  - 8.--That said real estate cannot be divided without loss or injury to the parties interested and it would be for the benefit and advantage of all the parties with interest in said real estate that the same should be sold by a trustee to be appointed by your Honorable Court and the net proceeds be divided among the parties interested in said real estate.
- Therefore Your orators pray Your Honors for the following relief--
1. That Your Honors will pass the decree of your Honorable Court that the real estate of which the said Anna W. Hughes died seized and possessed, and being the same real estate as described in