Madge F. Cramer, infant, by Charles F. Cramer her father and next friend
Vs.
Lillian F. Titlow and Charles Titlow her husband
Madge F. Cramer, Infant, and Charles C. Waters, Guardian, Mortgagee, &c.

NO. 7795 EQUITY.

No. 7795 Equity in the Circuit Court for Frederick Court, sitting as a Court of Equity.

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

The Bill of Complaint of Madge F. Cramer, infant, by Charles M. Cramer her father and next friend respectfully represents unto Your Honorable Court--

1. That your complainant, Madge F. Cramer in company with Lillian F. Titlow, her sister are the owners of a certain piece or parcel of land with improvements thereon, situated in the town of Thurmont, Frederick County, Maryland, which is more fully described in a deed from Charles M. Cramer and wife dated April 4th 1901, and recorded in liber D. H. H. No. 11 folio 174 one of the land redords for Frederick County, said original deed being filed herewith marked exhibit A., which together with all other exhibits filed, it is prayed may be taken and considered as a part of this Bill of Complaint.

2. That the said property and premises mentioned in exhibit A were conveyed subject to a mortgage given thereon by said Charles M. Cramer and wife, to secure the payment of the sum of Three Hundred dollars payable to Charles C. Waters guardian, said mortgage bearing date April 4 1901 and is recorded among the land records for Frederick County, a certified copy of said mortgage being filed herewith marked Exhibit B.

3. That Lillian F. Titlow, (nee Cramer) was, on or about the 2nd day of July 1904, married unto a certain Vharles TTitlow, and that in consequence of said marriage, her share and interest in said real estate has now become due and demandable.

4. That the property mentioned in Exhibit A is not susceptible of division between the parties in interest, without loss and injury, and that it would be to the interest and advantage of the parties, and especially to the advantage of the infant that the same should be sold, and proceeds after payment of the costs and expenses and hhe mortgage sebt be divided between the said Madge C. Cramer and Lillian F. Titlow, the parties in interest.

To the end therefore--

(a) That said property may be sold under a decree of Your Honorable Court, and the proceeds distributed in accordance with the allegations contained in said Bill of Complaint.

(b) And that said Complainant may have such other and further relief as the nature and equity of her case may require.

May it please Your Honors to grant unto Your Complainant the writ of subpoena in the usual form directed to the Sheriff of Frederick County, against Lillian F. Yitlow and Charles Titlow her husband, Madge F. Cramer, infant and Charles C. Waters, Guardian mortgagee, commanding them and each of them to be and appear in Your Honorable Court in person or by solicitor, on some day certain to be named therein, to answer the premises, and to show cause, if any they have, why a decree should not be passed as prayed.

And as in duty &c.

Emory L. Coblentz
Charles C. Waters
Solicitor for Complainant

EXHIBIT A.

This deed made this 4th day of April in the year nineteen hundred and one by Charles M. Cramer and Annie G. Cramer, his wife of Frederick County, State of MAryland, Witnesseth--Yhat for and in consideration of the sum of Six Hundred and fifty dollars to us in hand paid, we the said Charles M. Cramer and Annie G. Cramer his wife do grant in fee simple unto Lillian F. Cramer all that lot or parcel of ground situate, lying and being in Thurmont, Frederick County, State of Maryland, on South Church or Water street, and fronting 28½ feet on said street and running back a depth of 146½ feet with rear of same width as front, together with all the buildings and improvements thereon and all the rights and ways thereunto belonging, subject however to a mortgage for Three Hundred