14. That the property and premises mwntioned and set forth in Exhibit A since the death of the life tenants, the said Anna Mary Thomas has been unoccupied and is unoccupied today, with no one in charge, and with no proper insurance on the buildings thereon, which is to the detriment of Your Complainants, and that said property is greatly deteriorating by reason of having no one in charge of the same.

15. That your complainants are entitled to receive their share out of the said premises mentioned in Exhibit A., that the same is not susceptible of division among the parties without loss and injury, and that it would be for the interest, benefit and advantage of the parties to this cause and especially to your complainants that said Propeety be sold and the proceeds after the payment of the expenses of these proceedings be divided among the parties thereunto entitled according to their respective rights and interests.

16. That under the language used in said deed Exhibit A., your complainants have made as parties defendants to this cause the following grand children, to the end that they may be brought into this proceeding so that in the passage of any decree for the sale of the land mentioned in Exhibit A., their rights may be determined and they be bound Viz--Mary Elizabeth Padgett; Eleanor Wells Goodell and Robert Goodell, her husband, children of Margaret Ellen Padgett; John E. O. Thomas, Jacob Thomas and Grace Thomas his wife, Dr. Joseph G. Thomas and Edith Thomas, his wife, Robert Thomas, Mary Dutrow and Myrtlin Dutrow, her husband, Catherine Thomas, (widow) Nannie Snouffer and Paul Snouffer, her husband, Children of Mary Catherine Thomas, Celeste Hull and Harry C. Hull, her husband, Ada Lamar and Robert LAmar, her husband, lindsay Day and Kitty Louise Day, his wife, Ida McCeney and McCeney her husband_ irving Day and Anna MAry Day, Thomas Day, Arthur Day and Margaret Day, children of Flora May Day, all of whom are residents of the State of Maryland, except Catherine Thomas, (Widow) who resides in Washington D. C.

Your Complainants therefore pray--

(a) That the property and premises mentioned and set forth in Exhibit A may be decreed to be sold and the proceeds after the payment of the expenses of these proceedings may be divided among your complainants and other parties to this cause agreeable to the terms and conditions set forth in said Exhibit A and according to their respective rights and interests.

(b) and for such other and further relief as the nature and equity of their case may require.

May it please Your Honors to grant unto your complainants the writ of subpoena in the usual form directed against mrgaret Ellen PAdgett and John C. Padgett, her husband; Flora May day and Richard R. Day her husband; Mary Catherine Thomas (widow) J. Howard Allnutt, Trustee of Mary Catherine Thomas, J. Travers Thomas and David D. Thomas, Executors of Anna Mary Thomas, deceased; J. Fenton Thomas, jr., infant; Mary Elizabeth PAdgett, Eleanor Wells Goodell and Robert Goodell, her husband, John E. O. Thomas, Jacob Thomas and Grace Thomas his wife, Dr. Jos. G. Thomas and Edith Thomas, his wife; Robert Thomas, Mary Dutrow and Myrtlin Dutrow, her husband; Nannie Snouffer and Paul Snouffer Celeste Hull and Harry C. Hull, her husband, Lidsay Day and Kitty Louise Day, his wife, irving Day, and Anna Mary Day, Thomas Day, Arthur Day and Margaret Day, infants, and all of whom reside in Frederick County Maryland, and Ada Lamar and Robert Lamar her husband who resides in BAltimore City, Maryland, and Ida McCeney and McCeney her husband who reside in Montgomery county, State of Maryland commanding them and each of them to appear in Your Honorable Court 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, also an order of publication directed against Catherine Thomas (widow) ~~a non-resident~~ of the State of MAryland, living in the District of Columbia, warning her to appear in person or by solicitor and warning her of the substance of said Bill and that she appear as aforesaid to sho cause why a decree should not be passed as prayed.

as in duty bound &c.

--Chas. C. Waters

Solicitor for Complainants.