BILL OF COMPLAINT

Minnie N.Perry and Dr.Benjamin C.Perry, Agent of Minnie N.Perry, Vs. Bertha R.Strube and George Robertson Dennis,Jr.	"	No.9 3 3 6 E Q U I T Y. In the Circuit Court for Frederick County in EQUITY.

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The Bill of Complaint of Minnie N.Perry and Dr.Benjamin C.Perry,Agent of Minnie N.Perry,respectfully shows unto your Honors:--

1.That they are residents of Frederick County,in the State of Maryland,as is also George R.Dennis Jr.one of the Defendants,but that the said Bertha R.Strube resides in Greenvale,Langdon,District of Columbia.

(2) That Ann R.Dronenburg,late of Frederick County,but now deceased,departed this life a number of years ago intestate,seized and posessed of certain real estate lying and being in Urbana District,Frederick County,Maryland,and more perticulary hereinafter described,and leaving surviving her ahusband,Charles Dronenburg,who has since departed this life,and the following children and heirs at law,togather with their respeptive husbands and wifes,as follows:--Emma I.Yaste and B.Frank Yaste,her husband,and E.Leola Dixon of Washington,District of Columbia,Jesse Dixon of Baltimore City,Maryland,Marjorie Smith and Albert W.Smith,her husband, Nellie Sikken and Ernest A.Sikken,her husband,of Prince George'S County,Maryland and William Sumwalt of said County and State,Mary D.Yerby and Howard Yerby,her husband,of Cape May Court House,New Jersey,C.Belle Strube and William H.Strube, her husband,of Ivy City,District of Columbia,Bertha R.Strube and Charles Strube, her husband,of Greenvale,Langdon,District of Columbia,Alice Dronenburg,Laura M. Pyles and Wallis Pyles,her husband,Charles W.Dronenburg and Manzella E.Dronenburg,his wifw,of Urbana,Frederick County,Maryland.

(3) That the said real estate hereinbefore mentioned consisted of all those pieces or parcels of land,situated,lying and being in Urbana District,Frederick County,Maryland,and more perticularly described as the two acres,more or less, tract first described,the 26 acres and two perch tract a part of the second described parcel,and the 4 acre tract,the third described parcel of land in a deed from Charles Dronenburg to the said Ann R.Droneneburg,dated the 9th day of April 1890,and recorded in Liber W.I.P.No,11,folio 206,a certified copy of which said deed is filed herewith as a part of this bill of Complaint and is marked Exhibit A.

(4) That the said heirs at law of Ann R.Dronenburg through their Agent and Attorney,George Robertson Dennis Jr.on the 10th day of April,1915,entered into an agreement of sale with Minnie N.Perry for the herein described real estate at and for the sum of Three Thousand Six Hundred and Fifty-Five Dollars ($3,655.00) and took the acknowledgement and agreement of purchase of your complainant and accepted the deposit required by said advertisement of sale,all of which will more fully and at large appear by the authority to the said George Robertson Dennis Jr.,herewith fibed marked Exhibit B,and the acknowledgement and agreement of purchase of the said Benjamin C.Perry,Agent for Minnie N.Perry,herewith filed and marked Exhibit C.

(5) That your complainant,said Minnie N.Perry,through her Agent,Dr.Benjamin C. Perry,bought said property in good faith and stands ready to pay unto the said George Robertson Dennis Jr.,Agent and Attorney for the heirs of Ann R.Dronenburg the balence due on the said purchase price of said property upon the delivery to her of the good and sufficient deed for said property duly executed by all the