

BILL OF COMPLAINT

Julia A.Fox and William I.Fox
her husband.

Vs.

Anna M.Speak and George Speak
her husband;George Fix and Sarah
Fox his wife;Nacy Welty and Isaac
Welty her husband;Lilly Staub and
Charles Staub her husband;Virginia
Knauff,Maggie Krise and Charles Krise
her husband;Emma Catherine Bubel and
Jacob Dubel her husband,and Dora Speak
and William Speak,Infants,

DEFENDANTS.

NO. 9250 EQUITY.

In the Circuit Court for
Frederick County, In
EQUITY.

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity. The Bill of Complaint of Julia A. Fox and William I. Fox her husband, respectfully represents unto your Honorable Court;:-

- 1. That a certain Mary Catherine Biggs, late of Frederick county, but now deceased, departed this life some time during the month of November, in the year 1914, intestate, seized and possessed of certain pieces or parcels of land, situate, lying and being in Frederick County, Maryland described as follows; (a) all that tract or parcel of land which was conveyed to the said Mary Catherine Biggs by deed from Julia A. Miller et al. dated Dec 2nd 1905 and is recorded in Liber S.T.H. No. 274, Folio 126 one of the land records for Frederick County. (b) by deed from Julia A. Sophia Fox and husband, dated Sept 29th, 1896, to said Mary Catherine Biggs, and is recorded in Liber J.L.J. No. 14, Folio 469, one of said land records, certified copies of said deeds being filed herewith as a part of the Bill of Complaint, marked Exhibit "A" and "B" which together with all other exhibits herewith filed it is prayed may be taken and considered as a part hereof.
- 2. That the said Mary Catherine Biggs being so seized and possessed as aforesaid left surviving her as her heirs at law and next of kin to whom the real estate mentioned in Exhibits "A" and "B" vested, the following: -The Complainants in this cause Julia A Fox a sister whose husbands name is William I. Fox; and the heirs of Jane E. Fox, a ~~deceased~~ ~~sister~~ deceased sister, who left surviving her the following heirs, to wit-Anna M. Speak a daughter whose husbands name is George Speak; George Fox a son whose wives name is Sarah Fox; Nancy Welty a daughter, whose husband's name is Isaac Welty and Lillie Staub a daughter whose husband's name is Charles Staub; also the following children by a second husband of said Jane E. Fox (the seconds husband's name being William Speak) namely, Dora Speak, Mildred Speak and William Speak, all of whom are infants under the age of twenty one years, and the following heirs of Susan M. Kanoff a deceased sister Namely: -Virginia Kanouff; Maggie Krise whose husbands name is Charles Krise and Emma Catherine Dubel, whose husband's name is Jacob Buble. All of the aforementioned live in Frederick County, in the State of Maryland.
- 3. That the property and premises mentioned in Exhibits "A" and "B" are not susceptible of division between the parties in interest without loss and injury, and that it would be to the interest, benefit and advantage of all the parties to this cause, and especially to said infants, that the said property be sold and after the payment of the costs and expences of these proceedings that the residue be divided among the parties in interest according to their respective rights and interests.

TO THE END THEREFORE;-

(a) That the property herein mentioned may be sold under a decree of your Honorable Court, and the proceeds divided among the parties in interest, after the payment of costs and expences. (b) And that your Complainants may have such other and further