

Court of Equity. The Bill of Complaint of Arthur H. Crowwell and Harriet E. Crowwell his wife respectfully represents unto your Honorable Court:-

1. That a certain Susan Crowwell, late of Frederick County, departed this life in or about the year eighteen hundred and eighty five, leaving a last will and testament, which has been duly admitted to probate by the Orphans' Court for Frederick County, a duly certified copy of said will being filed herewith marked Exhibit "A", which, together with all other Exhibits hereafter filed it is prayed may be taken and considered as a part of the Bill of Complaint.
2. That the said Susan Crowwell at the time of her death was seized and possessed of a certain piece or parcel of land with improvements thereon, situated in the town of Walkersville Frederick County, Maryland, the same having been conveyed to her by deed from S.W. Stauffer and wife, dated September 14th 1880, and is recorded in Liber A.F. No. 9, Folio 316 one of the land records for Frederick County, a duly certified copy of said deed being filed herewith marked Exhibit "B".
3. That under the terms of the Will of the said Susan Crowwell (Exhibit "A") the property and premises described in Exhibit "B" was devised unto a daughter Amelia Crowwell, for and during her life, with a provision that a son, Zahariah Taylor Crowwell be permitted to remain in said property during his life or until he married, all of which will fully appear by reference to said Exhibit "A".
4. That the said Susan Crowwell made no disposition of the property mentioned in Exhibit "A" after the term of the life tenancies created thereunder, and that the property and premises mentioned in Exhibit "B" descended to and vested in the Complainant and the Defendants hereinafter mentioned and set forth.
5. That the said Susan Crowwell, left surviving her at the time of her death, the following children, viz:- Your Complainant a son, Arthur H. Crowwell Amelia C. Crowwell (unmarried) Thomas Zachariah T. Crowwell (unmarried) Winfield Scott Crowwell, Philemon I. Crowwell, William H. Crowwell, and Mary E. Holtz, with the exception of your Complainant, all of said children are now dead.
6. That Winfield Scott Crowwell, Philemon I. Crowwell, Amelia C. Crowwell and Thomas Z. T. Crowwell, died intestate without leaving any heirs at law or next of kin, then surviving.
7. That William H. Crowwell, a son above mentioned died leaving surviving him, the following children, to wit:- Robert Crowwell, whose wife's name is Emma Crowwell; Clark Crowwell whose wife's name is \_\_\_\_\_ Crowwell; Fannie Fink whose husband's name is Edward Fink; Virgie Houck whose husband's name is Charles Houck and Florence Snyder, who is dead, and who left surviving her two children, to wit, Bessie Snyder, who is married but her husband's name is unknown to your Complainant and a son Ira Snyder, and his wife being unknown to your Complainant, all of the above live in Frederick County, and are all adults, except Bessie Snyder \_\_\_\_\_ who was last heard from in the State of West Virginia and Ira Snyder last being heard from at Johnstown, in the State of Pennsylvania.
8. That Mary E. Holtz, a daughter above mentioned died leaving surviving her, the following children, to wit:- Clarence Holtz whose wife's name is \_\_\_\_\_ Holtz, John Holtz, whose wife's name is Bertie Holtz William Holtz, whose wife's name is \_\_\_\_\_ Holtz; Granville Holtz, whose wife's name is \_\_\_\_\_ Holtz; Emma Martz, whose husband's name is Theodore Martz, Laura V. Zimmerman, whose husband's name is Lewis Zimmerman, all of whom are adults and reside in Frederick County, Maryland.
9. That the Real Estate mentioned in Exhibit "A" and "B" is not susceptible of division among 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 that said real estate be sold and the proceeds of sale after the payment of the costs and expenses, be divided among the parties hereto according to their respective rights and interests.

TO THE END THEREFORE!

(a) That a Decree may be passed directing that the real estate mentioned in these proceedings may be sold and after the payment of the costs and expenses attending said sale, that the same may be divided among the parties to this cause according to their respective rights and interests.

(b) That your Complainants may have such other and further relief as the nature and Equity of their case may require. May your Honors grant unto this Complainant the writ of subpoena in the usual form directed against Robert Crowwell and Emma Crowwell his wife; Clark Crowwell and \_\_\_\_\_ Crowwell his wife; Fannie Fink and Edward Fink her husband; Virgie Houck and Charles Houck her husband; Clarence Holtz and \_\_\_\_\_ Holtz his wife; John Holtz and Bertie Holtz his wife; William Holtz and \_\_\_\_\_