

age of 28 years and is married his wifes name being Kattie Care , that the said Charles F.Care is now arrived at the age of 26 years and is married his wifes name being Celia Care, that the said Anna M.Care, has arrived at the age of 24 years and is unmarried, that the said Mary L.Care has arrived at the age of 21 years and is unmarried and that the said Warren M.Care is still an Infant and has arrived at the age of 19 years. And that the said Harry R.Care and Katie his wife and the said Anna M.Care (Unmarried) and the said Warren M.Care are all of them residents of Baltimore City and the State of Maryland, and that the said Charles F.Care and Celia Care his wife are non residents of the State of Maryland residing at Helmer in the State of Indiana.

3. That the said Charles F.Care and Ari ana S.Care in the lifetime of the said Charles F.Care executed to the Real Estate and Improvement Company of Baltimore City a mortgage of the land conveyed in said Exhibit No.1 which said mortgage was for the sum of \$ _____ and is recorded in Liber J.L.J.No.6, folio 297 et seq one of the land records for Frederick County. And your Oratrix avers that there was on March 18th A.D.1914 a balance of \$250.00 due on said mortgage which your Oratrix Ariana S.Care now Shermer paid and that said mortgage was duly assigned to the said Ariana S.Care. That the said Charles F.Care and Ariana S.Care in the lifetime of the said Charles F.Care executed to Real Estate and Improvement Company of Baltimore City, a mortgage of the land conveyed in exhibit No,1 which said mortgage was for the sum of \$75.00 and is duly recorded in Liber J.L.J.No.8 folio 326 et seq one of the land records for Frederick County. And your Oratrix avers that there was on March 18th, A.D.1914, the sum of \$75.00 due on said mortgage which your Oratrix Ariana S.Care now Shermer paid, and that said mortgage was duly assigned to the said Ariana S.Care. All of which will fully appear with the assignments by Duly certified copies of said mortgage herewith filed and are marked Exhibits No 2 and 3 to the Bill of Complaint.

4. That the Real Estate herein described is not susceptible of partition amongst the parties thereto entitled without loss and injury and it would be to the best interest and advantage of all the parties having an interest therein especially the Infant Warren M.Care, that said real estate be sold under a decree of your Honorable Court and the proceeds of such sale after the payment of the expenses of sale and the liens thereon be divided amongst the parties entitled thereto under the direction of this Honorable Court.

5. That the said Ariana S.Care now Ariana S.Shermer as the assignee of the mortgagee and James S. Shermer her husband be made parties Defendants in this proceeding.

And Your Oratrix prays for the following relief

1. That the land and premises mentioned and described in the Bill of Complaint be sold under a decree of your Honorable Court by a Trustee to be therein named and the proceeds of such sale brought into your Honorable Court and after the payment of all expenses of sale, public dues and charges, the usual commissions and one reasonable counsel fee and all mortgage and other liens on said land and premises the surplus if any be divided amongst the parties entitled thereto as their respective interests may appear to this Honorable Court. And for general relief.

May it please your Honor to grant unto your Oratorx the writ of sub-poena commanding the said Ariana S.Care now Ariana S.Shermer Widow of Charles F.Care, deceased and the said Ariana S.Care, assignee Mortgagees , and James S.Shermer her husband and the said Harry R.Care and Katie Care his wife, Anna M.Care, Mary L.Care and the said Infant Warren M.Care to be and appear in your Honorable Court on some certain day to be named therein either in person or by solicitor and answer the amended Bill of Complaint and show cause if any they or either of them have why a decree should not be passed fer. as prayed for. And that an order of publication may issue giving notice to the said Charles F.Care and Celia Care his wife non-residents of the State of Maryland of the object and purpose of the amended Bill of Complaint filed in this cause and warning them to be and appear in this Honorable Court either in person or by Solicitor on some day certain to be named therein and answer the premises and show cause if they or either of them may have why a decree should not be passed as prayed for.

And as in duty etc, will ever pray etc, Albert S. Brown
Sol. for Plaintiff