

B I L L O F C O M P L A I N T .

Helen M. Wilklow and Reginald	"	No. 9535 EQUITY.
Wilklow, infants, by Sarah E.	"	In the Circuit Court for
Wilklow, their mother and	"	Frederick County,
next friend, and Sarah E.	"	In Equity.
Wilklow, individually.	"	
vs.	"	
Helen M. Wilklow and Reginald	"	
E. Wilklow, infants.	"	

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TO THE HONORABLE THE JUDGES OF SAID COURT!-

The Bill of Complaint of Sarah E. Wilklow as the mother and next friend of Helen M. Wilklow and Reginald E. Wilklow, infants, respectfully represents!

1. That the Sarah E. Wilklow is the mother of the said Helen M. Wilklow and Reginald E. Wilklow, infants, and that they have been residing in the State of Virginia, but are now temporarily in the State of Maryland, and that said infants have no guardian.
2. That a certain Cecil E. Wilklow, late of Frederick County, was in his lifetime, and at the time of his death, seized and possessed of certain real estate in Brunswick, Frederick County, Maryland, known as lot No. 65, on W.W. Wenner's Addition to Brunswick, and described in a certain deed from Charles A. Baker and wife to the said Cecil E. Wilklow, dated April 21, 1904, and recorded in Liber S.T.H. No. 267 at folio 70, one of the land records of said Frederick County, a certified copy of which said deed being filed herewith as part of this bill of complaint, and marked "Exhibit A"
3. That said Cecil E. Wilklow, being so seized and possessed of said real estate, departed this life intestate, on or about June 1906, leaving surviving him a widow the said Sarah E. Wilklow, and the said Helen M. Wilklow, a daughter now aged 12 years and Reginald E. Wilklow, a son now aged 10 years, to whom said real estate descended.
4. That said real estate is improved by a two story frame dwelling house, which is now and for some time past has been unoccupied, and in need of repairs, and that the income arising therefrom, when rented, will not justify the necessary expense to put the same in a habitable condition, so that said property is rapidly depreciating in value.
5. That it would be for the benefit and advantage of said infants to sell said real estate, and to invest the proceeds in some productive fund for their benefit.
6. That said real estate is not susceptible of partition without material loss and injury, to the parties entitled to interests therein, and that in order to make division of said interests, it will be necessary to sell said real estate and to divide the proceeds amongst the parties according to their several interests.

TO THE END, THEREFORE,

1. That said real estate may be sold by a trustee appointed by your Honorable Court for that purpose. (2) That the proceeds arising from said sale may be distributed amongst the parties in interest and invested in some safe security or securities. (3) And for such other and further relief as the nature of this case may require.

And may it please your Honors to grant unto your oratrix the writ of subpoena directed to the said Helen M. Wilklow and Reginald E. Wilklow, infants, now at Brunswick, in Frederick County, Maryland commanding them to be and appear in this Court, at some certain day, to be named therein, and answer the premises and abide by and perform such decree, as may be passed therein.

Filed Nov. 3rd, 1916.

H. K. DeLauter  
Solicitor for Complainant.

"EXHIBIT A"

At the request of Cecil E. Wilklow the following Deed is received for record and recorded May 24th, 1904, at 3.35 O'Clock P.M.

Test!- Samuel T. Haffner, Clerk.

This deed made this 21st day of April in the year Nineteen hundred and four, by us Charles A. Baker and Mollie Baker his wife, of Frederick County, State of Maryland, Witnesseth!- that for and consideration of the sum of Eight hundred and fifty Dollars, to us in hand paid at and before the sealing