

To the Honorable, the Judges of the Circuit Court for Frederick County, Maryland, sitting as a Court of Equity!-

Your Orators, complaining say!-

1.

That Harry C. Keefer, resident of Frederick City, in Frederick County, Maryland, died on the date May 25th, in the year 1903, leaving a last Will and Testament dated December 28th, 1901, and which was duly admitted to probate by the Orphans Court for Frederick County, Maryland, and which is found recorded in Liber C.E.S. No. 1, folios 459 etc. one of the Will Records in the Office of the register of Wills for Frederick County, Maryland, a duly certified copy of which is herewith filed as a part hereof, and marked "Exhibit A".

2.

That said last Will and Testament provides as follows, namely. - I give, devise and bequeath all of my property and estate of every character and description of which I shall die seized and possessed and wheresoever the same may be located unto my wife, Margaret H. Keefer, for and during her natural life, and no longer, and after the death of my said wife, I give, devise and bequeath all of my said property and estate, as follows, I give, devise and bequeath all of my said estate in remainder after the death of my said wife unto my brothers, Hiram M. Keefer, of Frederick, Maryland, William E. Keefer and Edward P. Keefer, residents of Washington City, District of Columbia, Joshua H. Keefer, resident of Baltimore City, Maryland, Elisha H. Keefer, resident of Philadelphia, in the State of Pennsylvania, and my sister Catherine Earney, wife of William Earney, resident of York, in the State of Pennsylvania, and my nephew, Abraham Kemp Keefer, resident of Frederick City, Maryland, to be equally divided among them, as tenants in common, share and share alike", - all of which will more fully and at large appear by reference to said "Exhibit A".

3.

That at the time of his death the said Harry C. Keefer was seized and possessed of a certain piece of real estate, consisting of a lot of ground, improved with a two story brick dwelling house thereon, situated, lying and being on the North side of West Third Street, in Frederick City, in Frederick County, State of Maryland, and being the same real estate as described in the Deed from J. William Payne and Reppie B. Payne, his wife, to Harry C. Keefer, dated April 1st, 1901, and recorded in Liber D.H. No. 11, folios 145 etc, one of the Land Records of Frederick County, Maryland, a duly certified copy of which said Deed is herewith filed as a part hereof, and marked "Exhibit B".

4.

That Margaret H. Keefer, the widow of the said Testator died at Frederick City, Maryland, on the date November 28th, in the year 1918, and said real estate has now vested in the parties to this Bill of Complaint under the terms of said "Exhibit A".

5.

That Hiram M. Keefer, the brother of said testator, died on the date December 15th, 1904, leaving a widow, Margaret S. C. Keefer, who died on the date March 17th, 1917, and also leaving your Oratrix, a daughter, Nannie C. Carty, who is a widow, and your Oratrix a daughter, Cora M. Keefer, who is unmarried, and who resides in Frederick County, Maryland, and also leaving surviving him a son Charles W. H. Keefer, who is dead, leaving surviving him, who died intestate, a widow, your Oratrix, who was Stella C. Keefer, now married, her husband, Dr. Debbaghugh, and resident of Washington City, District of Columbia, and also leaving surviving the said Charles H. Keefer, a son, the Defendant, Frank H. Keefer, who is an infant under 21 years of age, he having been born on the date August 26th, in the year 1899, and who is a resident of Washington City, District of Columbia, but who at the time of the filing this Bill of Complaint is temporarily in Frederick County, in the State of Maryland (-and your Orator further alleges that the said Hiram M. Keefer died intestate.

6.

That William E. Keefer, the brother of said Testator, died intestate on the date July 20th, 1904, and leaving a widow, Ella H. Keefer, who died on the date October 11th, 1916, and also leaving surviving him as his heirs at law, your Orator, William E. Keefer, who is unmarried, your Oratrix Virginia McRea Keefer, also unmarried, both of whom reside in Washington City, District of Columbia, and James J. Keefer, who is married to