

Elizabeth B. Keefer and who reside in New York City, New York.

7.

That your Orator, Edward Phillip Keefer, brother of said Testator, is married to your Oratrix, Lucinda Keefer, and reside in Washington City, in the District of Columbia.

8.

That Joshua H. Keefer, brother of said Testator, died at Baltimore City, Maryland, on the date May 18th, 1902, intestate, having been married to Catherine Keefer, who died before him on the date June 21st, 1898, and leaving surviving him as his only child and heir at law, your Oratrix, Addie C. Wilcoxon, who is married to your Oratrix, Francis M. Wilcoxon.

9.

That Elisha H. Keefer, brother of said Testator, died at Philadelphia, Pennsylvania, in the month of April 21st in the year 1909, intestate, leaving surviving him a widow, your Oratrix, Margaret Lennox Keefer, and a son, your Orator, Thomas S. Keefer, who is married to your Oratrix, Mabel Keefer, and who reside in the City of Philadelphia, in the State of Pennsylvania.

10.

That your Oratrix, Catherine K. Earney, who is married to your Orator, William H. S. Earney, now reside in the City of York, in the State of Pennsylvania, and she is a sister of said Testator,

11.

That your Orator, Abram Kemp Keefer, nephew of said Testator, is married to your Oratrix, Katherine E. Keefer, and reside in Frederick City, Frederick County, Maryland.

12.

That all of the parties to this Bill of Complaint are over twenty-one years of age, excepting the infant Defendant, Frank H. Keefer, who is an infant and who is married to the Defendant, Blanche Keefer, who is an adult and resident of Peeksville, New York, State.

13.

That since the death of said Margaret H. Keefer, life tenant, said real estate has been in the possession of Harry Lochner and family as tenants, who has agreed to pay rental therefor at the rate of \$15. per month beginning on the date January 1st, 1919.

14.

That said real estate is not susceptible of division or of partition among your Orators and the Defendant, and being all the parties entitled thereto, without loss and injury, and that it would be to the interest and advantage unto your Orators as well as for said infant Defendant, that said property be sold and the nett proceeds divided among the parties entitled thereto under the last Will and Testator, Harry C. Keefer,

Therefore your Orators pray your Honors for the following relief:-

1.

That said real estate as described in said "Exhibit B", may be sold by a trustee to be appointed by your Honorable Court, and that the nett proceeds arising therefrom may be divided among the parties who may be entitled thereto under the terms of the last Will of Harry C. Keefer, deceased, "Exhibit A".

2.

And for such other and further relief to which your Orators may be entitled in the premises, and as to your Honors will appear to be proper in the premises.

May it please your Honors to grant unto your Orators the writ of subpoena directed unto the said infant Defendant Frank H. Keefer, who is temporarily in Frederick County, Maryland, commending him to be in your Honorable Court, in person or by his Attorney or Guardian, on some certain day to be named in said writ, and answer then the premises and abide by and perform such Decree as may be passed by your Honors therein.

And as in duty bound, etc.

Jacob Rohrback  
Solicitor for Plaintiffs.

I, Harry C. Keefer, resident of Frederick City, in Frederick County, in the State of Maryland do make and publish this to be my last will and testament, in manner and form following that is to say:-

After the payment of all my just debts and funeral expenses, I give and bequeath all of my property and estate, of which I shall die seized and possessed, as follows:-

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 whersoever 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