

No, 9867. Equity,

Bill of Complaint.

Austin F. Arnold, Dorothy Grace Arnold,	#	No, 9867. Equity.
Emma Annabell Arnold and J, Leslie Arnold,	#	In the Circuit Court for Frederick
Infants, by D, Charles Flock Their Next	#	County, Sitting as a Court Of Equity.
Friend,	#	
	#	
Vs,	#	
Mary laRue Arnold, Infant.	#	

To the Honorable Judges of the Circuit Court for Frederick County. Sitting as
as a Court of Equity,

The Bill of Complaint of Austin F, Arnold, Dorothy Grace Arnold, Emma Annabell Arnold, and J, Leslie D, Arnold, Infants, by Charles D, Flock, their next friend, respectfully represents unto Your Honorable Court;-

1st, That Grace S, Arnold. late of Frederick County, now deceased, was in her life time and at the time of her death, seized and possessed of certain real estate, situated in Burketts ville, in Frederick County, Maryland, which was conveyed unto the said S, Grace Arnold by two deeds the one executed by Mary I, Gaver, Widow, bearing date the 7th day of January, A,D,1914, and duly recorded in Liber H.W.B. No,308, folio 10, one of the land records of Frederick County, as will fully appear by certified copies of said deed filed herewith marked "Exhibit ", A, and the other marked or executed by Milton E, akers, et al., to the said Grace Arnold, bearing date the 7th, day of January A,D. 1914, and recorded in Liber H,W,B. No,308, folio 3, one of the land records of Frederick County, a certified copy of which is filed herewith "marked "Exhibit B". both of which Exhibits, together with all other exhibits herewith filed, it is prayed may be taken and considered as a part of this Bill of complaint. The said two pieces of ground described in the aforesaid Exhibits, lie contiguous to each other and form one property upon which the said S, Grace Arnold resided at the time of her death, as hereinafter set forth,

2nd, That the said S, Grace Arnold being seized and possessed as aforesaid departed this life intestate on or about the 14th day of October A.D. 1918, leaving surviving her no husband. but the Following children, all of whom infants, under the age of twenty one years, to wit:- a son Austin F. Arnold, aged about 12 years, a daughter Emma Annabell Arnold, about Nine years a son J, Leslie Arnold aged about Seven Years, a daughter Mary LeRue Arnold, aged about Three years, to whom the said land described in Exhibits A, and B. descended by inheritance upon the death of their said Mother. in accordance with the law of descent of the State of Maryland.

3rd, That the said land mentioned in Exhibits A, and B. is not susceptible of division among the parties thereunto entitled, without loss and injury. and it would be to the interest, benefit and advantage of the the infant defendants, in this case, as well as the infant Plaintiffs, that the land mentioned in said Exhibits, be sold and the proceeds arising therefrom be divided among the parties to this Bill of Complaint according to their respective rights and interests,

To the end therefore that a decree may be passed;-

(a) for the sale of the Real Estate mentioned in Exhibits A, and B. and the distribution of the proceeds among the parties entitled thereto,

(b) and for such other and further relief as the nature and Equity of your complainants may require.

May it please your Honors to grant unto your complainants a writ of Subpoena against the said Mary leRue Arnold, who now resides with the said D, Charles Flock, near Petersville, in Frederick County, Maryland, commanding her to be and appear in your Honorable Court on some day certain to be named therein, to answer the premises and to abide by and perform such decree as may be passed therein.

And as in duty bound, etc.,

Emery L. Coblentz.
Solicitor for Complainants,

Filed October 31st, 1918