No 7636, Equity.

Bill of Complaint.

Noah Baltzell	(	No, 7636. Equity,
	)	In the Circuit Court For Frederick
Vs.	(	County, Sitting In Equity,
Mary F. Baltzell. widow,	)	
Bertie B. Baltzell, and	(	
Susan C. Baltzell, Ada	)	
M. Baltzell, and Charles	(	
W. Baltzell, Infants, and	)	
Mary E, Grimes, Assignee	(	
Of Mortgagee.		

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

The Bill of Complaint of Noah Baltzell of Frederick County, in the State of Maryland, respectfully represents unto Your Honors;-

1. That Your Complainant in connection with Levi Baltzell, his brother were the owners in common of certain pieces or paccels of land, situated in Creagerstown. Election District, in Frederick County, Maryland, containing in the aggregate, One Hundred acres of land, more or less, and which was conveyed unto your Complainant and the said Levi Baltzell by by deed executed by Agustus M. Geesey and Mary C. Geesey, his wife, dated April 5th, A,D.1881, and duly recorded in the land records of Frederick County, as will more fully appear by reference to a certified Copy of said deed, filed herewith, marked Exhibit, A, which, together with all other Exhibits herewith filed may be taken, and considered, as a part of this Bill of complaint,

2, That the said Levi Baltzell, departed this lfe intestate, on or about the month of May, A,D, 1903. leaving surviving him, a widow, Mary F. Baltzell who resides in Frederick County, Maryland, namely a daughter, Bertie B. Baltzell who is an adult, over the age of twenty One years a daughter Susan C. Baltzell a daughter Ada M. Bltzell and a son Charles W, Baltzell the latter three childdren, being under the age of Twenty One years,

3, That the said Levi Baltzell. and your complainant, Noah Baltzell, being indebted unto a certain Warner T, Grimes upon their promissory note in the sum of Sixteen Hundred Dollars, for the purpose of securing the same, executed, unto the said, Warner T, Grimes; a deed of Mortgage, in which Mary F, Baltzell the wife of said Levi Baltzell joined, conveying the property, mentioned, in exhibit "A," upon which mortgage thereis still due, and Owing the sum of fifteen hundred and fifty dollars, with some interest, that said mortgage has been assigned in writing unto the defendant, Mary E, Grimes, all of Which will more fully appear, by reference to said Mortgage and assignments, filed herewith, marked Exhibit. "B".

4. That the last mentioned in Exhibit "A" is not susceptible of division. among the parties having interest therein and that it would be to the interest, and advantage, of all said parties having interest therein, and especially to th the infant defendants to have the property sold, and the proceeds of sale after the payment of the mortgage debt due thereon distributed to the parties thereunt entitled, according to their respective rights, and interests,

To the End Therefore.

(a) That a decree may be passed for the sale of the real estate, mentioned in Exhibit "A,"

(B) That your Complainant may have such other and further relief as the nature and Equity of his case may require,

May it please your Honors to grant unto your Complainants the writ of subpoena, in the usual form against the said Susan C, Baltzell. Ada M. Baltzell and Charles W, Baltzell all of whom are infants, under the age of twenty One years, and reside with their mother, Mary F. Baltzell, in Frederick County, Maryland, commanding them, and each of them, to be and appear in Your Honorable Court on some day certain to be named therein. to answer the premises and to show cau cause if any they have