

No, 9991 Equity,

1- That Abel S, Vansant, late of Frederick County, deceased, was in his life time, seized and possessed of a farm situated in Woodville District, in Frederick County, in the state of Maryland, containing One Hundred and seventy Seven and One half Acres of land, more or less, which was conveyed to him by Dr, Thomas W, Simpson, Executor, by deed dated February 1st, A,D, 1892, and duly recorded in Liber J,1,J, No, I, folio 141. one of the Land records of Frederick County, a certified copy of which said deed is filed herewith marked Exhibit No,I, and which is prayed to be taken as part of this Bill, of complaint, as fully as if herein set forth, in word and figures,

2- That being seized and possessed, of the real estate aforesaid, the said Abel S, Vansant, died intestate, on or about the 1st day of January, A,D, 1914 leaving surviving him a Widow, Claudia M, Vansant, and the following named Children, as his Only heirs at law,

James R, Vansant, a son, who is unmarried; Richard W, Vansant a son who is unmarried, Susie M, Purdum a daughter who is married and whose husbands name is Wilfred Purdum; Virginia Harrison, a daughter who is married, and whose husbands name is James Harrison, Ella Devilbiss, a daughter who is married, and whose husbands name is Grover Devilbiss, (All of the above named parties being adults,) and the following children who are infants, under the age of twenty One years Stanley Vansant, a son Prentis W, Vansant, Rubie R, Vansant, a daughter, Maude Elizabeth Vansant, A daughter Florence Irene Vansant, a daughter Albert Vansant, a son, William W, Vansant, a son and Albert Wallace Vansant, a son,

3- that upon the death of the said, Abel S, Vansant, intestate, as aforesaid, the said Real Estate descended to and became vested in his said Children and heirs at Law, Namely, James R Vansant, Richard W, Vansant, Susie M, Purdum, Virginia Harrison, Ella Devilbiss, Stanley Vansant, Prentis W, Vansant, Rubie R, Vansant, Maude Elizabeth, Vansant, Florence Irene Vansant, Albert Vansant, William W, Vansant and Abel Wallace Vansant; Who now own the said real estate, as Tenants in common, each of them being the owner of one undivided Thirteenth thereof, subject to the Dower right or interest therein of their Mother, the above named Claudia M, Vansant,

4-- that the said Land, being the farm hereinbefore mentioned, cannot be divided without Loss or injury, to the parties interested as aforesaid, and your Orators, and Oratrices, are advised and aver that they are entitled, to have the said real estate, sold under and by virtue of a decree of your Honorable Court, and the money arising from such sale divided among the parties entitled thereto according to their respective rights, and they further aver that such sale and division of the proceeds thereof would be for the benefit and advantage of all the parties hereto, infants as well as adults,

5- That the said Defendants, Stanley Vansant, Prentis W, Vansant, Rubie R, Maude Elizabeth Vansant, Florence Irene Vansant, Albert Vansant, Albert Vansant William W Vansant, and Abel Wallace Vansant, infants, and Claudia M, Vansant who is an adult, are all residents of Frederick County, in the state of Maryland, and all now reside on the said Farm situated in woodville District,

WHEREFORE Your Orators, and Oratrices pray for the following relief,

(1) That your Honorable Court may decree, a sale, of the real estate, hereinbefore mentioned, and described and a division of the money arising from such sale, among the aforesaid parties entitled thereto, according to their respective rights,

(2) that Your Orators and Oratrices may have all such other and further relief, to which they may be entitled, and the nature of the case may require,

And Your Orators and Oratrices pray for the following process; That the writ of Subpoena in the usual form may be issued, directed to the said Defendants, Stanley Vansant, Prentis W, Vansant, Rubie R, Vansant, Maude Elizabeth Vansant, Florence Irene Vansant, Albert Vansant, William W, Vansant, and Abel Wallace Vansant, infants, and Claudia M, Vansant, residing in Frederick County, in the State of Maryland, Commanding them and each of them, to be and appear in this Court on Some day certain to be named therein, to answer the premises and abide by and perform such decree as may be passed herein,

And as in duty so,

Ugner & Urner

Solicitors for the Plaintiffs,