

No. 10358 EQUITY.

BILL OF COMPLAINT.

John I.A.Lambert and Annie F. Lambert his wife, and Frances May Lambert, Infant by John I. A.Lamber her Father and next friend.

Vs.

Frances May Lambert, Infant and Howard H.Hartman

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No.10358 Equity.
In the Circuit Court for
Frederick County, In Equity.

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ToThe Honorable; the Judges of said Court--

The Bill Of Complaint of John I.A.La, bert and Annie F.Lambert his wife, and, Franhois May Lambert, an Infant by John I.A.Lambest her Father and next friend, respectfully shows unto your Honors:-

1st--That on the 27th day of September, A.D. 1911, your Orator John I.A.Lambert and Grace E.Lambert his wife, since deceased, purchased of Annie Elizabeth Cramer and Joseph C. Cramer her husband, a certain lot or parcel of land situate, lying and being on the South side of West South Street, in Frederick City, Frederick County and State of Maryland, the title to said lot or parcel of land being held in the name of your Orator and his then wife Grace E.Lambert, In Common and not by the entireties, as will appear by the deed for said land herewith filed and marked Exhibit "A" which said Exhibit together with all other Exhibits herewith filed it is prayed may be taken and considered as a part of this Bill of Complaint.

2nd--That the said Grace E.Lambert, departed this life on or about the 24th day of February A.D. 1915, intestate, leaving surviving her, her husband, your Orator John I.A.Lambert, and, an infant daughter, Frances May Lambert, now about eight years of age her sole heir at law. And that subsequently your Orator married for a second wife your Oratorice Annie F.Lambert, all of whom are residing at Rockville, Montgomery County, State of Maryland, with your Orator.

3rd. That your Orator and one Howard H.Hartman of Frederick County and State of Maryland, on the 19th day of November, A.D. 1920, entered into an agreement by which your Orator agreed to sell and the said Howard H.Hartman agreed to purchase the lot or parcel of land mentioned and conveyed by the said deed Exhibit "A" filed in this cause at and for the sum of \$1800.00 as will appear by a copy of the said agreement of sale herewith filed and marked Exhibit "B".

And your Orators aver and charge that the said price of \$1800.00 agreed to be paid for the said lot or parcel of land is adequate and fair and all that said lot of land could be reasonably be hoped to sell for if offered at public sale.

5th-- And your Oratorice aver and charge that said lot or parcel of land is improved by a dwelling house and that it is not susceptible of partition and division amongst the parties thereto entitled without loss and injury ; and that it would be to the best interest and advantage of all the parties concerned, especially the Infant Frances May Lambert, that the Court ratify and confirm the said agreement for the sale of said lot or parcel of land to Howard H.Hartman as set forth in the said agreement, herewith filed as Exhibit "B" and appoint a trustee to convey the said lot or parcel of land to the purchaser upon his paying the full purchase price to bring the said proceeds of sale into your Honorable Court to be distributed, after the payment of all necessary expenses, public dues, and costs including a reasonable Solicitors fee, to the parties