

2. That said Philip D. Lawrence left surviving him the following married children as his heirs at law in whom said real estate vested, as tenants in common, upon his death his wife, Annie Lawrence having pre-deceased him, to-wit; your Complainants, Vincent De-Paul Lawrence, a son, whose wife's name is Maggie Lawrence, both adults and residents of York County, Pennsylvania; Sara A. Lawrence, a daughter, an adult and resident of Frederick County, Maryland, Gertrude M. Kuhns, a daughter, whose husband's name is Frank Kuhns, both adults and residents of Adams County, Pennsylvania, Mae McGreedy, a daughter whose husband's name is James McGreedy, both adults and residents of Baltimore City, Maryland, Harry J. Kreis, the husband of Mary A. Kreis, a deceased daughter, and Gertrude Kreis and Harry P. Kreis, both adult children of the said Harry J. Kreis and the late Mary A. Kreis, all of whom last named are residents of Baltimore City, Maryland, and the following defendants; Marie G. Brookmyer (Nee Kreis) Margaret M. Kreis and Lawrence B. Kreis, all infant children of the said Harry J. Kreis and the late Mary A. Kreis, daughter of the said Philip D. Lawrence as aforesaid, all of whom are residents of Baltimore City, in the state of Maryland.

3. That said real is incapable of division and partition amongst the parties entitled to their respective interests, and it would be to the benefit and advantage of all the parties concerned, and especially to the infant defendants, that said real estate be sold under a decree of your Honorable Court and the proceeds thereof be distributed to those entitled according to their respective interests.

TO THE END, THEREFORE;

(1) That a decree may be passed by your Honorable Court decreeing the said of the real estate mentioned in this Bill of Complaint, and distribution made of the proceeds arising therefrom amongst the parties interested according to their respective interests.

(2) And for such other and further relief as the nature of their case may require. May it please your Honors to grant unto your Complainants the writ of subpoena to defendants, Marie G. Kreis, Margaret M. Kreis and Lawrence B. Kreis, all residing in Baltimore City in the State of Maryland, giving them notice of the object and substance of this Bill of Complaint and warning them to be and appear in your Honorable Court on some day to be named in said notice, to answer the Bill of Complaint and abide by and perform such decree as may be passed herein.

(Filed July 15-1921)

Guy K. Motter  
Solicitor for Complainants.

EXHIBIT NO. "1"

At the request of Philip Lawrence the following deed is received for record and recorded May 3rd. 1886 at 10.30 O'Clock A.M.

Test; W. Irving Parsons, Clerk.

This Deed made this Seventeenth day of August in the year Eighteen Hundred and Eighty Five by us Hester Barry widow of John Barry Dec'd, Alonzo Barry and Ella Barry his wife, Francis Barry and Blanche Colding widow and daughter of Edward Barry Dec'd, and John Barry- Witnesseth that in consideration of One Thousand Dollars we the said Hester Barry, Alonzo Barry and Ella Barry his wife, Francis Barry, Blanche Colding and John Barry, widow and heirs of John Barry Dec'd do grant in fee simple unto Philip Lawrence of Frederick County Maryland all that lot of ground with buildings and improvements thereon situate in the town of Emmitsburg on the main Street being the one half of a certain lot of ground known on plat of said town as lot number twelve lying alongside and adjoining lots of James A. Elder on the east side and adjoining