day of September A.D.1906, conveyed unto them another part or portion of said lot of ground, which said deeds are respectively recorded in Libers D.H.H.No111, folio 600, and Liber S.T.H.No.276, folio 318, both Land Records of the County aforesaid, as will appear by reference to certified copies of said deeds herewith filed and marked Exhibit B. and Exhibit C.

2. That being so seized of the residue of said lot of ground, the said Mary J.Baer departed this life on the 16th day of April in the year 1916, without leaving a will.

3. That the saal estate above mentioned having belonged to the said Mary J.Baer at the time of her death, and as your Complainants are advised and believe, died as to said real estate, intestate.

4. That the said Mary J.Baer left surviving her at the time of her death a son William A.Baer, and three daughters, Lillie Baer, Mollie E.Crum and Jessie Ramsburg to whom the interest and the said Mary J.Baer in and to said real estate descended as her only heirs at law.

5. That the said William A.Baer was seized in his lifetime of a one-fourth undivided interest in said real estate and departed this life on the 21st day of October A.D.1920, without leaving a will.

6. That the said one-fourth interest in said real estate having belonged to the said William A. Baer at the time of his death, and as your complainants are advised and believe, died as to said real estate intestate.

7. That the said William A.Baer left surviving him at the time of his death, a widow, Blanche Baer, and six infant children, Allen Baer, Elizabeth Baer, Lewis Baer, Charles Baer, Grace Baer and Ruth Baer, the parties hereinbefore named to whom the interest of the said William A.Baer in and to said real estate descended as his heirs at law subject to the rights of the said Blanche Bear, his widow.

8. That the said Mary J.Baer on the 15th day of November, A.D.1909, executed her deed of mortgage conveying the aforesaid real estate to Franklin B.Smith of Frederick, Maryland, to secure the payment of the sum of Five Hundred and Twenty-five dollars, which said mortgage was on the 5th day of April A.D.1913, assigned to Martin A.Castle on the 23rd day of May, A.D.1921, was assigned to the said Lillie Baer, all of which will appear be reference to said mortgage recorded in Liber S.T.H.No.289, folio 351, one of the said Land Records.

9. That the said real estate is not susceptible of partition without material loss and injury to the parties entitled to interests therein as above stated, and that, in order to make division of said interests, it will be necessary that said real estate be sold, and the proceeds thereof divided amongst the parties according to their several interests.

10. That the said Lillie Baer is a widow and resides in Frederick City, Frederick County, Maryland, on B.& O.Avenue.

11. That the said Mollie Crum is also a widow and resides with her sister, Lillie Baer, on B.&.O. Avenue in said Frederick City.

12. That the said Jessie Ramsburg intermarried with Nevin Ramsburg and both reside in Mt.Pleasant District, Frederick County, Maryland.

To the end therefore.

1. That a decree may be passed by this Court for the sale of the said real estate.

2. That the proceeds of sale may be distributed between the parties hereto according to their respective rights and interests.

3. That your Complainants may have such other and further relief as their case may require.

May it please your honors to grant unto your Oratrix the writ of subpoena, directed to the said Lillie Baer, Mollie Crum, Jessie Ramsburg, Nevin Ramsburg and Lillie Baer, Assignee, all residing in Frederick County Maryland, commanding them to be and appear in this Court at some certain day to be named therein, and answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.,

George R.Dennis Jr.
Solicitor for Plaintiffs.

(Filed November 5, 1921)