

No. 8520 Equity.

Bill of Complaint No. 8520 Equity.

Robert Biggs, Guardian for
Mildred H. Biggs, an infant,
Sheridan C. Biggs, an infant,
and Richard D. Biggs, an infant,

vs.

Sophie C. Biggs, Mildred H.
Biggs, an infant, Sheridan
C. Biggs, an infant, and
Richard D. Biggs, an infant.

"
"
"
"
"
"
"
"
"
"
"

No. 8520 Equity.
In the Circuit Court for
Frederick County,
In Equity.

-----0-----

To the Honorable, the Judges of the said Court;

Your orator Robert Biggs guardian for Mildred H. Biggs, Sheridan C. Biggs and Richard D. Biggs, all infants, complaining, says;

1. That he was appointed guardian for said infants by an order of the Orphans' Court of Frederick County and has duly qualified as such guardian, and he filed herewith as part hereof a certified copy of his letter of guardianship marked "Plaintiff's Exhibit A."

2. That the said infants are seized in fee simple in equal shares as tenants in common, subject to the dower rights of their mother, Sophie C. Biggs, of a lot of ground situate in Frederick County in the State of Maryland and fully and particularly described as follows, that is to say.

Beginning for the same at a point S. 11 1/4 E. 353 2/10 feet from the northeast corner of the lot conveyed to the Western Maryland Railroad for Station grounds, (said northeast corner being in the center line of the R.R. track 96 feet measured along said centre line from the point where east face of foundation wall of the station extended would intersect said centre line) and running thence (1) S. 11 1/4 E. 226 1/2 feet to the centre of the Hagerstown Road (2) S. 79 E. 410 1/2 feet along centre of said road (3) thence with lots heretofore sold N. 12 3/4 E. 209 4/10 feet to a stake; (4) N. 79 W. 503 8/10 feet to the beginning, containing 2 19/100 acres of land.

Being the same lot of ground which was granted and conveyed unto Sophie C. Biggs and unto the said infants by Jacob Rohrback and Robert Biggs, trustees, by a Deed dated the 26th day of January, 1910, and duly recorded among the Land Records of Frederick County; which deed is herewith filed as part hereof marked "Plaintiff's Exhibit B."

3. That the said property is improved by a large frame dwelling house and a number of outbuildings and the said improvements are now in need of considerable repair; that the said Sophie C. Biggs, the mother of the said infants, feels that the said property is an expensive one to be occupied and kept up by her and that the location is not desirable as a permanent place of residence having in view the necessity of educating said infants.

4. Your orator avers that it would be to the interest, benefit and advantage of said infants that the said property should be sold and the proceeds invested in some safe and productive securities for the benefit of said infants.

5. That your orator has received an offer of Thirty-Three Hundred Dollars (\$3300) for the said property from Charles J. Barrick which he and the said Sophie C. Biggs consider to be the full and fair market value of the said property.

To the end, therefore,

1. That the said sale made to the said Charles J. Barrick may be ratified and approved and the proceeds thereof invested under the order of this Court.

2. That your orator may have such other and further relief as his case may require.

May it please your Honor to grant unto your orator a writ of subpoena addressed to the said Sophie C. Biggs and Mildred H. Biggs, an infant, Sheridan C. Biggs, an infant and Richard D. Biggs, an