

BILL OF COMPLAINT.
No. 11144 Equity.

Carrie M. Shoop, widow, Arnold C.
Burkhart, Freda A. Burkhart,

vs.

William R. Shoop, defendant,
Charles R. Shoop, ..
Henry W. Shoop ..
Carrie Belle Shoop ..
Ernest Shoop ..
V. Jeanette Shoop ..
George C. Shoop ..
Lawrence E. Shoop ..
Rachel C. Shoop ..

No. 11144 E Q U I T Y.

In the Circuit Court

for

Frederick County

Sitting as a Court

of E Q U I T Y.

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TO THE HONORABLE, THE JUDGES OF SAID COURT.

Your Orators complaining say:

1. That William Shoop late of Washington County, Maryland, deceased, was in his lifetime seized and possessed in fee simple of the following described tract of unimproved mountain land, situate and lying near the Frederick and Washington County line in Frederick County, Maryland, and lying along the public road leading from _____ to _____ and containing Seventeen (17) acres of land, more or less, and being the same property which was conveyed to the said William Shoop, during his life time by Thomas Swope and wife by deed dated the 13th day of October, A.D. 1891, and recorded in Liber J.L.J. No. 7, folio 226, one of the Land Records of Frederick County, Maryland, a duly certified copy of said deed is herewith filed and marked "Exhibit A" and is asked to be considered as part hereof.
2. That the said William Shoop, departed this life on or about the 10th day of January, A.D. 1922, at his late residence near Smithsburg, in Washington County, Maryland, intestate, and left surviving him his widow, Laura V. Shoop and an only son, Ernest B. Shoop, to who the above described real estate descended and no others.
3. That the said Ernest B. Shoop, only surviving son of the said William Shoop, deceased, departed this life at his late residence near Smithsburg, on or about the 26th day of February, A.D. 1924, leaving a last will and testament devising and bequeathing his entire estate to his wife, Carrie M. Shoop, for life with remainder to all of the children of his said wife, a duly certified copy of said will is herewith filed and marked as "Exhibit B" and asked to be considered as part hereof.
4. That the said Laura V. Shoop, widow of William Shoop, deceased, departed this life as her late residence in Smithsburg, Washington County, Maryland, on or about the 15th day of May, A.D. 1925, leaving a last will and testament devising and bequeathing her interest in the real estate mentioned and described in the first paragraph of this Bill of Complaint to her grandchildren, the children of her deceased son, Ernest B. Shoop, a certified copy of said Will being filed herewith as Exhibit "C".
5. The children of the said Carrie M. Shoop, and the children of the said Ernest B. Shoop, deceased, who together with the said Carrie M. Shoop, widow, of the said Ernest B. Shoop, are the sole parties at interest in the hereinbefore mentioned and described real estate are as follows.
 - a. Your orator, the said Carrie M. Shoop, widow, as aforesaid, who is an adult 43 years old and resides in Washington County, Maryland.
 - b. Your orator Arnold C. Burkhart and, oratrix,
 - c. Freda A. Burkhart, both of whom are full age and reside near Smithsburg, Washington County, Maryland.

The above named Arnold C. Burkhart and Freda A. Burkhart both being the children of the said Carrie M. Shoop, to her former husband, Harry Burkhart, deceased who with,

 - d. William R. Shoop, infant,
 - e. Charles R. Shoop, infant,