

BILL OF COMPLAINT

Charles B. Grove and Annie M. Grove, his wife, Greenberry F. Grove, and Margaret E. Grove, his wife, Leonard S. Grove and Nellie F. Grove, his wife, Plaintiffs,	"	
	"	No. 7406 EQUITY.
	"	In the Circuit Court
	"	for Frederick County,
Vs.	"	in Equity.
Eleanor C. Grove, Violetta R. Grove, John D. Grove, Edward E. Grove, Christiana S. Landis and William H. Landis, her husband, and Lillie Kemp, Defendants.	"	
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To the Honorable, the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity;- The Bill of Complaint of Charles B. Grove and Annie M. Grove, his wife, Greenberry F. Grove and Margaret E. Grove, his wife, of Frederick County, State of Maryland, and Leonard S. Grove and Nellie F. Grove, his wife, of Washington County, in said state respectfully represents unto your Honors;

That Leonard S. Grove, late of Frederick County, deceased, was in his lifetime seized and possessed of a certain tract of land situated in said Frederick County, Maryland, containing 313 acres, 1 rood and 35 perches of land, as conveyed to him from Francis Thomas trustee, by deed dated November 24th, 1843, and recorded in Liber H.S. No. 21 folio 98, one of the Land Records of Frederick County, a certified copy of which deed is herewith marked "Exhibit A."

2. That subsequently, said Leonard S. Grove conveyed to Henry Boteler 112 acres, 1 rood and 1 perch of land, as is shown by deed dated December 23rd, 1844, and recorded among said Land Records in Liber W.B.T. No. 1 folio 149, a certified copy of which deed is herewith filed marked "Exhibit B" leaving for the land now containing in said farm 201 acres, and 18 perches, more or less.

3. That being so seized and possessed the said Leonard S. Grove departed this life intestate in the year 1873, leaving surviving him a widow, Rebecca Grove, and then following children as his heirs at law to whom said real estate descended, each taking a one-tenth interest, subject to the dower of their mother;- A son, Charles B. Grove, who is intermarried with Annie M. Grove, his wife; A son, Greenberry F. Grove, who is intermarried with Margaret E. Grove, his wife; A son, Leonard S. Grove, who is married with Nellie F. Grove, his wife; A son, John D. Grove who is unmarried; A son, Edward F. Grove, who is unmarried; A daughter Christiana S. Landis, who is intermarried with William H. Landis, her husband; A daughter, Ann M. I. Kemp whom intermarried with John Q. A. Kemp, her husband; a daughter Eleanor C. Grove, who is unmarried; A daughter Violetta R. Grove who is unmarried; A daughter Mary F. Grove (now deceased) who was unmarried.

4. That on the 8th day of May 1875 five of the above named children, viz., Christiana H. Landis and husband, Greenberry F. Grove and wife, Leonard S. Grove and wife, Charles B. Grove and wife, and Ann M. I. Kemp and husband conveyed, by deed duly recorded in Liber T.G. No. 3 folio 442, their undivided five-tenths interest in said farm to their Mother, Rebecca Grove, and their sister, said Eleanor C. Grove, a certified copy of which deed is herewith filed marked "Exhibit C".

5. That about the year _____ said widow, Rebecca Grove died leaving a last will and testament by which she gave to said John D. Grove and Edward F. Grove a vested remainder in the undivided one-fourth interest in said real estate which she got by said last mentioned deed, a certified copy of which will is herewith filed marked "Exhibit D", the present particular estate in said undivided one-fourth interest being held by said Eleanor C. Grove and Violetta R. Grove, or the survivor of them during their lives; or until their marriage.

6. That said daughter, Ann I. Kemp and her daughter husband, John Q. A. Kemp are both dead, leaving surviving them an only daughter Lillie Kemp, who is an adult over twenty-one years of age, unmarried,.