

Mrs. Lucille M. Leesnitzer  
and George W. Leesnitzer,  
Annie M. Cragg and John H.  
Cragg

Vs.

Amanda R. Edmonston and  
The Bank of Brunswick.

No. 11626 Equity.  
In the Circuit Court  
for Frederick County.

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TO THE HONORABLE JUDGES OF THE CIRCUIT COURT FOR FREDERICK COUNTY.

The Bill of Complaint of Lucille M. Leesnitzer and George W. Leesnitzer, her husband, Annie M. Cragg and John H. Cragg, her husband, respectfully represents to your Honorable Court;

FIRST; That a certain Roy Edmonston, late of Frederick County, died during the early part of the year 1927, intestate, seized and possesses of a tract or parcel of land situated in Petersville District Frederick County, Maryland, and fully described in a deed from Appheus D. Thomas, and others to said Roy Edmonston, recorded in Liber No. 350, Folio 548, one of the Land Records for Frederick County, and containing one and eighty-one hundredths (1 81/100 acres of land improved with a new dwelling house. A certified copy of said title is filed herewith marked Exhibit No. 1 which together with all other Exhibits your Complainants pray may be taken and considered as a part whereof.

SECOND; That said real estate at the time of the death of the said Roy Edmonston was encumbered with a mortgage executed by him to The Bank of Brunswick for the sum of THREE HUNDRED FIFTY (\$350.00) DOLLARS, said mortgage bearing date September 25th, 1925, and recorded in Liber 353, Folio 381, one of the Land Records for Frederick County, A certified copy is filed herewith marked Exhibit No. 2,

THIRD; That the said Roy Edmonston left surviving him as his heirs at law and next of kin, your Complainants, Lucille M. Leesnitzer, whose husband's name is George W. Leesnitzer, and a sister Annie M. Cragg, whose husband's name is John H. Cragg, and the defendant Amanda R. Edmonston, his widow, who as such heirs at law are entitled to said real estate subject to the mortgage Exhibit No. 2 aforesaid.

FOURTH; That the said real estate is incapable of division or partition amongst the parties entitled according to their respective rights and would be to the benefit and advantage of all the parties to said cause that said real estate be sold under a decree of your Honorable Court and the proceeds arising therefrom distributed to the parties entitled according to their respective interests.

TO THE END THEREFORE;

FIRST; That your Honorable Court may assume jurisdiction in the premises decree a sale of said real estate and distribute the proceeds arising therefrom according to the interest and rights of the parties entitled.

SECOND; And for such other and further relief as the nature of the case may require.

May it please your Honors to grant unto complainants the Writ of Subpoena directed to the Bank of Brunswick, a body corporate and Amanda R. Edmonston, widow, requiring them and each of them to be and appear in your Honorable Court on some set date named and said Writ answer the premises, abide by and perform such decree as may be passed herein.

(Filed December 20, 1927)

Stoner and Storm  
Attorneys for Complainants.

" EXHIBIT No. 1"

At the request of Roy Edmonston the following deed was received for record and recorded December 19, 1924, at 10.55 o'clock A.M.

Test; Eli G. Haugh, Clerk.

.50¢ Revenue Stamp.

THIS DEED made this 15th, day of December, in the year Nineteen Hundred and twenty-four, by us,