TO THE HONORABLE JUDGES OF SAID COURT:

The Petition and Replication of May Bussard to the Pleas filed by Olive Frances Beall and Louis C. Beall, her husband, respectfully represents unto your Honorable Court:

FIRST: That your Petitioner in preparing the Bill of Complaint filed in this cause, inadvertently omitted to make parties Defendants, James E. Beall, Louis C. Beall, John C. Beall, Richard F. Beall and Olive V. E. Beall, Defendants, remaindermen under the terms of the last Will and Testament of James O. Bussard.

SECOND: That the said May Bussard discovered the same when the Pleas of Olive Frances Beall and Louis C. Beall, her husband, were filed in the above entitled cause and upon discovery of the same, filed an ex parte Petition in your Honorable Court asking that said infants be made parties Defendants and upon said Petition your Honorable Court on the 13th day of March, 1931, signed an Order directing that they be made parties Defendants and that a subpoena be issued in the usual form directed to them; and that on the 17th day of March, 1931, said infants were duly summoned.

THIRD: That in order to clear the record in this case the said May Bussard for Replication to the above mentioned Pleas filed, says:

1st. That she admits the matters and things stated in the first and second Pleas herein filed.

Leslie N. Coblentz

William M. Storm
SOLICITORS FOR MAY BUSSARD.

(Filed March 21, 1931)

PETITION FOR APPOINTING GUARDIAN AD LITEM ETC.

May Bussard, Widow	:	
vs.	:	No. 12196 Equity.
Olive Frances Beall, Louis C. Beall, et al. and James E. Beall, Louis C. Beall, John C. Beall, Richard F. Beall and Olive V. E. Beall (Infants)	:	In the Circuit Court for Frederick County, in Equity.

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To the Honorable Judges of said Court:-

The Petition of Louis C. Beall and Olive Frances Beall, his wife, the parents of James E. Beall, Louis C. Beall, John C. Beall, Richard F. Beall and Olive V. E. Beall, joint defendants and infants, with these petitioners, in the above entitled cause, respectfully shows unto your Honors.

1st. That the said James E. Beall, John C. Beall, Louis C. Beall, Richard F. Beall and Olive V. E. Beall, infant defendants, in the above entitled cause, have been duly returned summoned, but being infants, and not having any legal guardian within the jurisidction of this Court to Answer and defend the said suit for them; and being infants cannot defend said suit for themselves.

2nd. That these Petitioners show unto your Honors, that under the terms of the last Will and Testament of James O. Bussard, filed in this cause the real estate mentioned and described in this cause, and prayed to be sold herein, is devised unto your Petitioner Olive Frances Beall in trust, during her lifetime, and after her death the same to be sold, and the proceeds divided equally among her living children, or heirs at law. That by the term of said will 5 Shares of the Capital Stock of the Citizens Bank of Frederick, are bequeathed to Olive Frances Beall, in trust during her life time, and after her death, the same to be sold and equally divided among her children, or her heirs heirs at law. That a number of legal questions will arise under the terms of said will, relative as to the rights of said infants, and these petitioners charge that it will be necessary and to the advantage of said infants for the Court to appoint a Solicitor to appear and defend for said infants, to the end that the rights of said infants may be had under