

2- That the Complainant obtained an absolute divorce from the Defendant on the 25th day of February, 1930, by a decree of the Circuit Court for Frederick County, Maryland, filed in No. 12,001 Equity, as will appear by the proceedings filed therein, but that their property rights, both as to real and personal estate, were never determined therein or thereby by the Court, because your Complainant's solicitor did not ask for or require an accounting, especially pertaining to the personal property, your Complainant being ill at the time and was not advised by his solicitor of his rights therein and thereto, and that he has just been advised by his present counsel of his rights therein and thereto, immediately before the filing of this Bill of Complaint.

3- That just before the immediate filing of his Bill of Complaint for an absolute divorce, charging the Defendant with adultery, which the decree of your Honorable Court granted to your Complainant, as aforesaid, the Defendant took from, removed and still has in her possession certain furniture and household goods that cost your Complainant from \$2,000.00 to \$3,000.00, that he paid for in cash out of his earnings during their married life and while he was employed by the Baltimore and Ohio Railroad Company, which goods and chattels she has secreted and still holds, and for which your Complainant prays an accounting in this proceeding.

4- That your Complainant bought a home and property in Brunswick, Maryland, and paid for it himself out of his wages, in full, and that said property cost him about \$3,500.00 plus the cost of keeping the same in necessary repairs and taxes, which have cost him more than \$300.00 since the divorce proceedings and that during that time he has received approximately \$300.00 rent for said house, and that at the time he bought it from Raymond L. Crabill and wife, the same was deeded to himself and Alice Louise Orrison, his wife, by deed dated April 21, 1922, and recorded in Liber 338, folio 476, one of the Land Records of Frederick County, a certified copy of which deed is duly filed herewith as Exhibit "No. 1" which, together with all other Exhibits, is prayed to be taken and considered as a part hereof by your Honorable Court.

5- That said house and lot is at present in need of repairs to keep it in tenantable condition, taxes being due also, but the Defendant has refused to contribute towards the expense thereof and has so notified your Complainant.

6- That at the time of having the property and real estate deeded to himself and the Defendant by the entirety, your Complainant naturally expected the Defendant to be a true and loyal wife to him, but because of her infidelity to him, and because of the divorce granted against her, and his solicitor's failure to ask for an adjudication of their rights in the premises, both as to a proper settlement of their personal estate and their rights in said real estate, which your Complainant now asks, he is advised that he and the Defendant now are tenants in common as to the real estate, but that he is entitled to an adjudication of his rights in said personal property and real estate by your Honorable Court.

7- That the real estate mentioned and described in this Bill of Complaint and in Exhibit "No. 1" is not susceptible of partition without material loss and injury to the parties entitled to interests therein, as above stated, and that in order to make division of said interests, it will be necessary that said real estate be sold and the proceeds thereof be divided amongst the parties according to their several interests.

To the end, therefore:

(1) That a decree may be passed for the sale of said real estate.

(2) That the proceeds of sale may be distributed between your Orator and the said Alice Louise Orrison, according to their respective rights and interests, after deducting therefrom the value of the personal property, that has been seized and taken away by the Defendant, according to the value thereof, belonging to the Complainant, as his interests and rights may appear therein.