Ex.

BILL OF COMPLAINT

Nellie Elizabeth de Bruyn and Hubert de Bruyn, her husband. Plaintiffs.	:	No. 13056 Equity.
	:	In the Circuit Court for
vs.	:	Frederick County, sitting
Annie Malinda Cashour. Defendant.	:	as a Court of Equity.

To the Honorable, the Judges of said Court:

The Bill of Complaint of Nellie Elizabeth de Bruyn and Hubert de Bruyn, her husband, respectfully shows unto your Honors:

1. That William T. Cashour, late of Frederick County in the State of Maryland, died intestate on or about February 20th A. D. 1935 seized and possessed of a tract of land, being a farm improved with a dwelling house and outbuildings, situated and lying in New Market District in Frederick County in the State of Maryland, containing 103 Acres, 1 Rood and 3 3/4 Perches of land, more or less, which said land was conveyed to the said William T. Cashour by Elizabeth D. Matthews by deed dated October 19th A. D. 1933 and recorded in Liber No. 390, Folio 444, one of the Land Records of Frederick County; a certified copy of the said deed being filed herewith, marked Exhibit No. 1, and prayed to be taken and considered as part of this Bill of Complaint as fully as if here inserted in words and figures.

2. That the said William T. Cashour left surviving him a widow, Annie Malinda Cashour, who is now living and who is the Defendant in this case, and one child, Nellie Elizabeth de Bruyn, who is the Plaintiff herein, and who is now living and married and whose husband's name is Hubert de Bruyn.

3. That under the law of inheritance of the State of Maryland the aforesaid real estate is now owned, as tenants in common, by the said Annie Malinda Cashour and Nellie Elizabeth de Bruyn, who are the only heirs at law of the said William T. Cashour, the said Annie Malinda Cashour being entitled to a one-third undivided share or interest and the said Nellie Elizabeth de Bruyn being entitled to a two-thirds undivided share or interest in the said real estate.

4. That the said land and improvements, being the real estate mentioned and described in the first paragraph of this Bill of Complaint, cannot be divided without loss or injury to the parties interested.

5. That all of the parties to this Bill of Complaint, namely, the said Nellie Elizabeth de Bruyn and Hubert de Bruyn, her husband, and Annie Malinda Cashour, are adults, over twenty-one years of age, and the said Annie Malinda Cashour resides in Frederick County in the State of Maryland, and the said Nellie Elizabeth de Bruyn and Hubert de Bruyn, her husband, reside in the City of Washington in the District of Columbia.

Wherefore the Plaintiffs pray for the following relief:

(1) That your Honorable Court will pass a decree for the sale of the aforesaid real estate by a Trustee or Trustees appointed by said decree, and that the proceeds of said sale may be divided among the parties entitled thereto according to their respective rights and interests under the decree and direction of your Honorable Court.

(2) That the Plaintiffs may have all such other and further relief to which they may be entitled and the nature of the case may require.

And the Plaintiffs pray for the following process:

That the writ of subpoena in the usual form, directed to the Sheriff of Frederick County, may be issued out of your Honorable Court, against the Defendant, Annie Malinda Cashour, resident of Frederick County in the State of Maryland, commanding her to appear in this Honorable Court on some certain day to be named therein, to answer the premises and abide by and perform such decree as may be herein passed.

And as in duty &c.

Milton G. Urner, Jr.
Solicitor for Plaintiffs.

(Filed March 15, 1935)