Quilting Frolic", or by whatever name the same may be called, containing one hundred and firty-seven (157) acres and two (2) roods of land, more or less, and being the same lands that are described in a deed dated October 16, 1918, from Gladys S. Nusbaum Bond and husband to John E. Naill and wife, which said deed is duly recorded in Liber No. 326, folio 178, one of the Land Records of Frederick County, Maryland, a certified copy of which said deed is herewith filed as Exhibit No. 1, and which, together with all other exhibits, is prayed to be taken and considered as a part hereof.

(2) All that tract and parcel of land situated in Woodville District, in Frederick County, Maryland, containing One Hundred Thirty-two (132) Acres and Seventy-two (72) square perches of land, more or less, and being the same tract or parcel of land that was conveyed to John E. Naill from Mary J. Ulrich and husband, and Benjamin Ray, by deed dated March 1, 1909, and duly recorded in Liber S. T. H. 286, folio 384, one of the Land Records of Frederick County, Maryland, a certified copy of which said deed is herewith filed as Exhibit No. 2.

(3) All those two lots or parcels of land situated in the village of Taylorsville in Carroll County in the State of Maryland, being contiguous to one another and together fronting on the Road from Taylorsville to Mt. Airy, in said County, one hundred and thirty (130) feet, more or less, and extending back one hundred and ninety (190) feet, more or less, for depth, it being the same land and real estate that was conveyed to the said John E. Naill from Carrie A. Cronk and husband, by deed dated April 15, 1920, and duly recorded in Liber E. O. C. No. 136, folio 349, etc., one of the Land Records of Carroll County, Maryland, a certified copy of which said deed is herewith filed as Exhibit No. 3.

4. That the said mansion house is now, and for sometime has been unoccupied and is therefore producing no income, and that no suitable tenant can be obtained for the same.

5. That it would be to the benefit and advantage of the said infant complainant to sell the said real estate, and to invest the proceeds thereof in some productive fund for his benefit.

6. That the said real estate is not susceptible of partition or division 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 divided amongst the parties according to their several interests.

TO THE END, THEREFORE,

1. That the said real estate may be sold and the proceeds thereof invested for the benefit of said infant complainant under the authority and jurisdiction of your Honorable Court,

2. And that your complainant may have such other and further relief as his case may require.

MAY IT PLEASE YOUR HONORS to grant unto your complainant the writ of subpoena directed to the said John C. Naill and Lillian Naill, his wife, and Elizabeth Ann Naill, unmarried, all of whom are adults and residents of Carroll County, Maryland; and also the writ of subpoena directed to the said Prentiss M. VanSant, Infant, residing in Frederick County, Maryland, commanding them to be and appear in this Court at some certain day, to be named therein, and answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.,

D. Princeton Buckey
Solicitor for Complainant.

(Filed January 2, 1934)

EXHIBIT NO. 1.

At the request of John E. Naill and wife the following Deed is received for record and recorded Oct. 16th, 1918 at 3:05 o'clock P. M.

Test: Eli G. Haugh, Clerk.

U. S. INTERNAL Revenue Stamp $7.00