

of the original Bill of Complaint that she had no interest in the growing crops, farming implements, household furniture, live stock and other personal property, but that said Petition to amend the Bill of Complaint filed on July 11th, 1935, is an additional effort to harass respondent and deprive him of personal property which is being used for the benefit of his children.

THIRD: Answering the third and fourth paragraphs your respondent says that Complainant has no interest whatsoever in the articles of personal property mentioned therein.

After having fully answered, respondent asks that said Amended Bill of Complaint be dismissed with costs.

William .M. Storm
SOLICITOR FOR RESPONDENT.

(Filed July 23, 1935)

AMENDED BILL OF COMPLAINT

Katherine V. Lambert	:	No. 13118 Equity
vs.	:	In the Circuit Court
Arthur D. Lambert	:	For Frederick County.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Amended Bill of Complaint of Katherine V. Lambert respectfully represents unto your Honorable Court:

FIRST: That the Complainant and the Defendant Acquired by title deed a certain parcel of real estate situated in Frederick County, Maryland, containing 104 acres, more or less, said deed conveying said property to the said Katherine V. Lambert and Arthur D. Lambert, they being at said time husband and wife, said property having been conveyed by William D. N. Zimmerman and Myrtle E. Zimmerman, his wife, dated September 29, 1924, and recorded in Liber No. 350, folio 239, one of the Land Records for Frederick County. A certified copy of said deed is filed herewith marked Exhibit No. 1, which together with all other Exhibits your Complainant prays may be taken and considered as a part hereof.

SECOND: That at the time of acquiring said property the said Katherine V. Lambert and Arthur D. Lambert were married each to the other as aforesaid, but since that date, that is, the 18th day of June, 1935, the said Arthur D. Lambert was divorced A VINCULO MATRIMONII from Katherine V. Lambert, a certified copy of which is filed herewith marked Exhibit No. 2 and as a result thereof, the property hereinbefore mentioned vested in them and is so held by them as tenants in common.

THIRD: That the said real estate mentioned herein is incapable of division or partition among the parties mentioned herein without loss or injury and it would be to the best advantage and interest of all parties to said cause that said real estate be sold under a Decree of your Honorable Court and the proceeds arising therefrom be distributed to the parties entitled according to their respective interests.

FOURTH: That the Plaintiff and the Defendant also owned as tenants in common the wheat crop and certain other growing crops, farming implements, livestock and other personal property on said farm, as well as household furniture and effects located in the home on said farm.

TO THE END, THEREFORE,

1. That your Honorable Court may appoint Trustees to sell the real estate and to distribute the proceeds arising therefrom according to the interest of the parties entitled.

1A. That a sale of all the personal property aforesaid also be decreed by this Court to be made by the trustees to be appointed as aforesaid, and the proceeds therefrom to be divided between the parties hereto according to their respective interests.

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