

BILL OF COMPLAINT

Pearl May Lowman, widow, Frank Lowman and Grace Lowman, his wife, Rosa C. Keefer and Bernard T. Keefer, her husband, Adults,	" " " " "	No. 13267 Equity. In the Circuit Court for Frederick County, Maryland, sitting as a Court of Equity.
vs.	"	
Florence May Dern and Lloyd C. Dern, her husband, Estella G. Devilbiss and Maurice M. Devilbiss, her husband, Amelia E. Garber and Earl R. Garber, her husband, Adults, and Albert Lowman, Infant.	" " " " " " "	

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Your Complainants, Pearl May Lowman, widow of Harry A. Lowman, deceased, Frank Lowman and Grace Lowman, his wife, Rosa C. Keefer and Bernard T. Keefer, her husband, all of whom are adults, respectfully represent unto your Honorable Court:

1- That on the 31st day of March, 1936, a certain Harry A. Lowman died, intestate in Frederick County, Maryland, seized and possessed of two certain tracts and parcels of land, situate, lying and being in Frederick County, Maryland. The first of said tracts is described in a deed to the said Harry A. Lowman from John W. Wilson and wife dated March 29, 1901, and recorded in Liber D. H. H. No. 11, folio 187, etc., one of the Land Records of Frederick County, Maryland, and also in a deed to the said Harry A. Lowman from William P. Maulsby, Jr., and Hammond Urner, Trustees, dated March 25, 1904, and recorded in Liber S.T.H. No. 265, folio 342, etc., one of the Land Records of Frederick County, Maryland, said tract and parcel of land containing 123 acres, 2 roods and 30 square perches of land, more or less, Certified copies of both of said deeds are filed herewith as Exhibits Nos. 1 and 2, respectively, and which together with all other Exhibits are prayed to be taken and considered as a part of this Bill of Complaint. The second tract and parcel of land is described in a deed to the said Harry A. Lowman from Fannie A. Nicodemus, et al. Administratrix, etc., dated August 4, 1922, and recorded in Liber 340, folio 113, etc., one of the Land Records of Frederick County; a certified copy of said deed is herewith filed as a part hereof as Exhibit No. 3.

2- That upon the death of the said Harry A. Lowman, intestate, the said real estate mentioned in Exhibits Nos. 1, 2 and 3 descended to and vested in the following named parties, to wit: a widow, Pearl May Lowman; a son, Frank Lowman, whose wife's name is Grace Lowman; a daughter, Rosa C. Keefer, whose husband's name is Bernard T. Keefer; Plaintiffs, and all of whom are adults, residing in Frederick and Carroll Counties, Maryland; a daughter, Florence May Dern, whose husband's name is Lloyd C. Dern, a daughter, Estella G. Devilbiss, whose husband's name is Maurice M. Devilbiss; a daughter, Amelia E. Garber, whose husband's name is Earl R. Garber, all of whom are adults and reside in Frederick County, Maryland; a son, Albert Lowman, who is an infant and unmarried and who resides with his mother, Pearl May Lowman, in Frederick County, Maryland; and that the above named widow and children are all of and the only heirs at law of Harry A. Lowman, deceased.

3- That the real estate mentioned and described in Exhibits Nos. 1, 2 and 3 is not susceptible of division or partition among the parties entitled to interests and are interested in the same, without loss or injury, and it would be, your Complainants aver, to the benefit and advantage of all the parties that said real estate be sold, under the direction of your Honorable Court, and the net proceeds distributed according to the rights and interests of the parties entitled.