

Maryland, departed this life intestate on or about the twenty-first day of January, in the year 1938, leaving her surviving as her only next of kin and heirs at law a daughter, Minnie S. Keller, unmarried, a resident of Frederick County, State of Maryland, a son, James R. Keller, whose wife's name is Ruth S. Keller, a resident of Washington County, State of Maryland, a son, Charles W. Keller, whose wife's name is Maude S. Keller, and a daughter, Heloise K. Sheridan, whose husband's name is J. Ridgely Sheridan, who are residents of the State of West Virginia and non-residents of the State of Maryland; and all of the said next of kin and heirs at law are adults over the age of twenty-one years.

Second: That The Citizens National Bank of Frederick, a body corporate, your complainant, holds a judgment of record on the law side of your Honorable Court against the said Valietta W. Keller, under the name of Vallie S. Keller, being No. 135 Trials, May Term, 1927, in the amount of Ten Thousand Four Hundred Fifty Dollars (\$10,450.00), with interest from June 18, 1929, which said judgment is still owing and unpaid, a certified copy thereof being herewith filed and marked "Exhibit No. 1," which, together with all other exhibits herewith filed, it is prayed may be taken and considered as part of this Bill of Complaint.

Third: That the said Valietta W. Keller was in her life and at the time of her death seised in fee simple of considerable real estate, situated in the village of Buckeystown, Frederick County, State of Maryland, which was conveyed unto her by two deeds, one from Charles W. Keller, et al., bearing date on the ninth day of July, 1917, and recorded in Liber No. 322, Folio 248, and the other from Charles E. Keller, Jr., unmarried, bearing date on the fourteenth day of July, 1917, and recorded in Liber No. 322, Folio 247, both Land Records of Frederick County, and being the first parcel described in each of the said deeds aforesaid, containing one acre, two roods and nine square perches of land more or less, and being the same real estate conveyed unto Charles E. Keller by Rachel C. Suman, by deed bearing date on the thirteenth day of July, 1899, and recorded in Liber H. W. B. No. 306, Folio 78, one of the Land Records of Frederick County, all of which will appear from Certified Copies of the said deeds herewith filed and marked Exhibit No. 2, No. 3, and No. 4.

Fourth: That the personal estate left by the said Valietta W. Keller, was and is wholly insufficient for the payment of her debts, and a sale of her real estate is necessary and should be made so that the proceeds of the sale thereof may be applied to the payment thereof, and that at the time of the filing of this Bill of Complaint no administration on the estate of the said Valietta W. Keller, deceased, has been granted by the Orphans Court of Frederick County.

WHEREFORE, it is prayed that a decree may be passed for the sale of the real estate of which the said Valietta W. Keller died seised and possessed, and for the appointment of some suitable person or persons as Trustee or Trustees to make said sale, and that the proceeds therefrom, after the payment of the costs and expenses of this proceeding may be applied to the payment of her debts in the order of their legal priority.

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

And may it please your Honors to grant unto your Complainant a writ of subpoena in the usual form directed to the Sheriff of Frederick County against the said Minnie S. Keller, and to the Sheriff of Washington County against the said James R. Keller and Ruth S. Keller, his wife, commanding them and each of them to be and appear in this Court on some certain day to be therein named, to answer the premises and to abide by and perform such decree as may be passed therein.

And may it please your Honors to grant unto your Complainant an order of publication, giving notice to the said Charles W. Keller and Maude S. Keller, his wife, Heloise K. Sheridan and J. Ridgely Sheridan, her husband, who are non-residents, as before stated,