

being Lot No. 29 in Block 24 as shown on the Plat of the Real Estate and Improvement Company's Second Subdivision of a part of Brunswick, as described in a deed from Lee Smith, unmarried to Ella Kline and Hugh C. Kline, her husband, dated January 30, 1926 and recorded in Liber 356 folio 240 one of the land records of Frederick County, Maryland, a certified copy of which is filed herewith marked Exhibit "A".

FOURTH: That the said Hugh C. Kline, during his life time executed a mortgage to the Real Estate and Improvement Company of Baltimore City, the balance of which mortgage, being in the amount of \$299.00 with interest from March 18, 1939, was assigned to Louise A. Carter, said mortgage and assignment being recorded in Liber 371 folio 397 one of the land records of Frederick County, Maryland, which said assigned mortgage is a lein against the real estate heretofore mentioned, a certified copy of which is filed herewith and marked Exhibit "B".

FIFTH: And being seized and possessed of said real estate the said Hugh C. Kline departed this life, intestate, which said real estate upon his death descended to an vested in the aforementioned heirs at law and next of kin as tenants in common as follows:

1/3 to Louise A. Carter;
1/3 to Richard K. Kline;
1/3 to Vera Smith.

subject to the lein of the above mentioned mortgage.

SIXTH: That there is now due and owing from the said Hugh C. Kline and his estate the sum of \$600.50 unto your Complainant for medical services personally rendered and for hospitalization in the Schnauffer Hospital located at Brunswick, Maryland owned and operated by your Complainant, a sworn to account of said indebtedness being filed herewith and marked Exhibit "C", which your Complainant prays may be taken as and considered a part hereof.

SEVENTH: That letters of administration have not been granted in the Estate of the said Hugh C. Kline and he did not leave any personal property other than personal effects, such as clothing.

EIGHTH: That your Orator is informed and believes that the said personal property is not sufficient to discharge any of the just debts due and owing by the said intestate, Hugh C. Kline.

To the end therefore:

1st. That your Honors will pass the decree of your Honorable Court, that the real estate of the said Hugh C. Kline, deceased may be sold for the payment of the amount of money due unto your Orators and any other Creditor's of the said Hugh C. Kline.

2nd. That your Honors will appoint a Trustee or Trustees to make sale of said real estate of the said Hugh C. Kline for the purpose of carrying out the decree of your Honorable Court in the premises.

3rd. And that your Orator may have such other and further relief as the nature of his case may require.

May it please your Honors to grant unto your Orator a writ of subpoena directed to the said Defendants, Louise A. Carter and Charles Carter, her husband, who live in Brunswick, Frederick County, Maryland, Richard Kline and Zoe Kline, his wife, who reside in Brunswick, Frederick County, Maryland, Vera Smith and Floyd Smith, her husband, who reside near Ijamsville, Frederick County, Maryland and Louise A. Carter, Mortgagee, who resides in Brunswick Frederick County, Maryland, commanding them and each of them to be and appear in your Honorable Court on 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.

Filed July 21, 1939.

Patrick M. Schnauffer
Patrick M. Schnauffer
Solicitor for Petitioner.