

## BILL OF COMPLAINT

Maude L. Rankin and  
Thomas Rankin, her  
husband,

"

No. 15627 Equity.

"

In the Circuit Court

vs.

"

Ralph B. Working and  
Letha Working, his  
wife

"

for Frederick County.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Maude L. Rankin, formerly Maude L. Working, and Thomas Rankin, her husband, respectfully represents unto your Honorable Court:

FIRST: That your Complainant, Maude L. Rankin, formerly Maude L. Working, is the owner in fee simple of an undivided one-half interest in a certain tract of land situate, lying and being in Hauvers District, Frederick County, Maryland, containing 64 acres and 40 perches of land, more or less, as described in a deed from Comenius Pryor, et. al. to Maude L. Working and Ralph B. Working, her husband, dated April 21, 1933, and recorded in Liber No. 388, folio 495 &c., one of the Land Records for Frederick County, certified copy of which is filed herewith marked Exhibit No. 1.

SECOND: That the owner of the other undivided one-half interest is Ralph B. Working, who was formerly the husband of your Complainant, but has since been divorced, thereby changing the title to said real estate above mentioned from tenants by the entireties to tenants in common.

THIRD: That said real estate is owned by your Complainant, Maude L. Rankin, formerly Maude L. Working, and the said Ralph B. Working, as tenants in common and is not susceptible of partition or division among the several parties so entitled without great loss and damage.

FOURTH: That it would be to the best interest and advantage to all the parties in interest that said real estate be sold under a Decree of your Honorable Court and the proceeds distributed to the several parties in interest, according to their respective rights.

TO THE END, THEREFORE:

1st. That a Decree may be passed by your Honorable Court, appointing Trustees and directing a sale of said real estate and distribution of the proceeds arising therefrom among the parties in interest, according to their respective interests.

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

May it please your Honors to grant unto your Complaints the Writ of Subpoena directed to Ralph B. Working and Letha Working, his wife, who reside in Hauvers District, near Sabill-  
asville, Frederick County, Maryland, commanding them and each of them to be and appear in this Honorable Court on some day certain to be named therein, answer the premises and abide by and perform such Decree as may be passed.

William M. Storm  
SOLICITOR FOR COMPLAINANT

Filed November 14, 1945.

## EXHIBIT NO. 1

At the request of Maude L. Working and  
husband, the following Deed is received  
for record and recorded Oct. 18, 1933 at  
11:35 o'clock A.M. U.S. Internal  
\$ .50  
Test: Eli G. Haugh, Clerk Revenue Stamp

THIS DEED, Made this 21st day of April in the year nineteen hundred and thirty-three by Comenius Pryor, Allen Pryor and Luella Pryor, his wife, Roy Pryor, Lena Pryor, his wife, Millie Ridenour, William Ridenour, her husband, Merle Pryor and Katherine Pryor, his wife, residents of Frederick County, State of Maryland, Ada F. Harbaugh, Fleet C. Harbaugh, her husband, Hattie Wachter, G. Roscoe Wachter, her husband, residents of Franklin County State