BILL OF COMPLAINT

Amos Edgar Graham and Edna Graham, his wife, Harry Norman Graham, widower, Mary Elizabeth Royer, widow, Edna Bell Morrison and John Morrison, her husband, Maggie May Eyler and Herbert Eyler, her husband, Plaintiffs,	:	No. 16062 Equity. In the Circuit Court for Frederick County, Maryland. In Equity.
vs.	:	
Lola Graham Luckenbaugh and William Luckenbaugh, her husband, Everett Graham, unmarried, and Garey Graham, Infant, children of a deceased son, Charles Cleveland Graham, All heirs at law of the said Charles Cleveland Graham, deceased, Defendants.	:	

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Your Orators and Oratrices, complaining, say:

1. That a certain Laura Barbara Graham, (whose husband, Amos Graham predeceased her) died on or about the 6th day of December, 1946, intestate, seized and possessed of two certain tracts, lots and parcels of land situate in Johnsville District, Frederick County, Maryland, that were conveyed to Amos Graham and Laura Barbara Graham, his wife (Amos Graham having predeceased his said wife, whereby she became the sole owner of said lands as tenant by the entirety) by deed from Benjamin L. Blessing and Rhoda E. Blessing, his wife, dated the 30th day of November, 1918, and which said deed is duly recorded in Liber 326, folio 272, etc., one of the Land Records for Frederick County, Maryland, a certified copy of which deed is filed herewith as Exhibit No. 1, which together with all other Exhibits are prayed to be taken and considered as a part hereof.

2. That being so seized and possessed of the said real estate, the said Laura Barbara Graham died intestate as aforesaid, leaving no husband, but the following heirs at law to whom said real estate descended and in whom it is now vested, to-wit:

A son, Amos Edgar Graham, one of your Orators, whose wife's name is Edna Graham, both of whom are adults and reside in Waynesboro, Pennsylvania; a son, Harry Norman Graham, widower, an adult, whose wife is dead and resides in Frederick City, Maryland; a daughter, Mary Elizabeth Royer, widow, an adult, her husband being dead and resides in Frederick County, Maryland; a daughter, Edna Bell Morrison, whose husband's name is John Morrison, both of whom are adults and reside in Hanover, Pennsylvania; a daughter, Maggie May Eyler, whose husband's name is Herberty Eyler, both of whom are adults and reside in Frederick County, Maryland, all of whom are plaintiffs in this case; also, - the following grandchildren, they being the children of a son, Charles Cleveland Graham, who died intestate and all of whom reside in Hanover, Pennsylvania, to-wit: a daughter, Lola Graham Luckenbaugh, whose husband's name is Jacob Luckenbaugh, both of whom are adults; a son, Everett Graham, an adult unmarried; a son, Garey Graham, an Infant, he being under the age of twenty-one years.

3. That none of the parties to this cause, either the plaintiffs or defendants, are in the Armed Forces of the United States of America, or any of its Allies.

4. That the real two tracts and parcels of real estate mentioned and described in this Bill or Exhibit No. 1, of which the said Laura Barbara Graham died seized and possessed, is not susceptible of partition or division without material loss and injury to all the parties to this cause who have an interest therein, because it consists of a dwelling house and outbuildings erected on two small lots of land, and it would be to the best interest of all the parties that said real estate be sold under a decree of Your Honorable Court and the proceeds divided amongst the parties according to their respective interests therein.

5. That it would be especially to the best interest of the Infant that said real estate