

BILL OF COMPLAINT

RUSSELL FRANKLIN DRONEBURG, SR. : NO. 16682 EQUITY
 AND VIRGINIA R. DRONEBURG, HIS :
 WIFE, : IN THE CIRCUIT COURT
 VS. : FOR FREDERICK COUNTY,
 RUSSELL FRANKLIN DRONEBURG, JR. : MARYLAND,
 AND MARY FRANCES DRONEBURG, :
 INFANTS. : IN EQUITY

 TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Russell Franklin, Sr. and Virginia R. Droneburg, his wife, respectfully represents unto your Honors:

FIRST: That on the 18th day of October, 1944, your Plaintiff, Russell Franklin Droneburg, Sr., purchased from Myra Edith Anderson and Amos T. Anderson, her husband, lots and the improvements thereon, situate in Linden Hills, City and County of Frederick, State of Maryland, and being designated as Lots Nos. 9 and 10 in Block F of Sub-Division thereof, which said real estate was conveyed unto your Plaintiff and the two minor Defendants, their children, as joint tenants, by deed dated October 18, 1944, and recorded in Liber 444, folio 244, one of the Land Records of Frederick County, Maryland, a certified copy of which is herewith filed as Exhibit Deed and prayed to be considered as a part hereof.

SECOND: That all of the parties to this cause are residents of Frederick County, State of Maryland, residing at Route 1, Frederick, Maryland.

THIRD: That your Plaintiffs have entered into an agreement to sell said real estate unto a certain J. Edgar Bussard of Ellerton, Frederick County, Maryland, for the sum of Eight Hundred Fifty Dollars (\$850.00) that represents an advantageous sale for the parties hereto; and your Petitioners aver it would be to the best interest and advantage to the owners of the property and especially the infant Defendants to have said agreement of sale ratified and confirmed by your Honorable Court, the original of which contract is filed herewith marked Exhibit Agreement.

FOURTH: That said real estate is not susceptible of division among the parties of interest therein without loss or injury.

WHEREFORE, YOUR PLAINTIFFS PRAY:

- (1) That the Agreement of Sale may be ratified and confirmed by your Honorable Court.
- (2) That a Trustee may be appointed to convey the real estate to the purchaser.
- (3) And for such other and further relief as the nature of the case may require.

E. Austin James
 E. AUSTIN JAMES

Benjamin B. Rosenstock
 BENJAMIN B. ROSENSTOCK

SOLICITORS FOR COMPLAINANTS

Filed July 28, 1949

EXHIBIT DEED

At the request of Russell Franklin Droneburg, Sr., et al
 the following Deed is received for record and recorded Oct.
 State of Md. 19, 1944, at 11:45 o'clock A.M. U. S. Internal
 \$.10 Recordation Tax Revenue Stamp
 Test: Ellis C. Wachter, Clerk. \$.55

THIS DEED, Made this 18 day of October, 1944, by us, Myra Edith Anderson and Amos T. Anderson, her husband, both of Frederick County, State of Maryland,

WITNESSETH, That for and in consideration of the sum of Ten Dollars, and other good and valuable considerations, the receipt of which is hereby acknowledged, we, the said Myra Edith