

above entitled matter, respectfully represents unto your Honors:

(1) That they neither admit nor deny the matters and facts set forth and alleged in said Bill of Complaint, but to the best of their knowledge, information and belief they believe the same to be true.

(2) That your Respondents consent to the passage of a Decree as prayed, but reserve their rights against the proceeds of said sale in the place and stead of their present interest therein.

And, as in duty bound,

Witness: R. Micenko

Charles C. Bartgis  
Charles C. Bartgis

R. Micenko

Teresa Bartgis  
Teresa Bartgis

COMMONWEALTH OF PENNSYLVANIA, ALLEGHENY COUNTY, TO-WIT:

I Hereby Certify, that on this 23 day of August, in the year Nineteen Hundred and Fifty-two, before me, the subscriber, a Notary Public of the Commonwealth of Pennsylvania, in and for Allegheny County, personally appeared Charles C. Bartgis and Teresa Bartgis, his wife, to me personally known, and acknowledged the foregoing Answer as and for their respective act and deed.

Witness my hand and Notarial Seal.

M. L. Schoffstall Notary Public  
M. L. Schoffstall, Notary Public  
5929 BROAD ST., PGH., PA.  
My Commission Expires November 26, 1955

Filed September 8, 1952

PETITION TO AMEND BILL OF  
COMPLAINT

Harry T. Anders, widower, et al

No. 17,395 Equity

vs.

In the Circuit Court  
for Frederick County,  
In Equity.

Ruth Wagner Osborne and Wilbur  
Osborne, her husband, et al.

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TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of the Complainants in the above-entitled case respectfully represents unto your Honors:

1. That since filing the Bill of Complaint in the above-entitled matter your Petitioners have learned that there was an additional sister of the said Emma M. Anders, whose name was Florence Shildt Albaugh, who heretofore departed this life leaving surviving her as her only child and heir at law, Florence Anne Albaugh, who has since intermarried with George Henry Strait and who resides with her husband at 2983 Cornwall Road, Baltimore 22, Maryland.

2. That the said Florence Anne Strait and George Henry Strait, her husband, are heirs at law of the said Emma M. Albaugh, late of Frederick County, deceased, and should have been enumerated among the heirs at law of Emma M. Albaugh as set out in paragraph 2 of said Bill of Complaint.

WHEREFORE, YOUR PETITIONERS PRAY that said Bill of Complaint may be amended to include the said Florence Anne Albaugh Strait and George Henry Strait, her husband, and that the said Florence Anne Albaugh Strait and George Henry Strait, her husband, may be made parties plaintiff in this cause.

Mathias and Mathias  
Mathias and Mathias  
Solicitors for Complainants

COURT ORDER

The foregoing Petition having been by the Court read and considered, it is thereupon this 17th day of September, 1952, ORDERED that leave be and is hereby granted to amend the