

BILL OF COMPLAINT

Sue Thackston Boice and Roberta Thackston	:	No. 17166 Equity
	:	In the Circuit Court
vs.	:	For Frederick County,
Jean Thackston Taylor.	:	Maryland,
	:	In Equity.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Sue Thackston Boice and Roberta Thackston, respectfully shows unto your Honors:

1. That Henry E. Thackston, late of Frederick County, Maryland, departed this life on or about the 26th day of July, 1951, seized and possessed of certain lots or parts of lots or parcels of land situate, lying and being in Middletown Election District, Frederick County, Maryland, improved with a modern frame residence, being all and the same real estate which was conveyed unto Bessie C. Thackston and Henry E. Thackston, her husband, by Mary M. Ossowski and Charles Ossowski, her husband, by deed dated May 27, 1940, and recorded in Liber No. 423, folio 551, a certified copy of which said deed is filed herewith as Exhibit "No. 1" and which is prayed may be taken and considered a part hereof, title to which said real estate vested absolutely in the said Henry E. Thackston by virtue of the right of survivorship upon the death of the said Bessie C. Thackston, which occurred on or about the 20th day of May, 1951.

2. That the said Henry E. Thackston died testate, leaving a Last Will and Testament dated July 21, 1951, duly admitted to probate by the Orphans Court for Frederick County, and recorded in Liber H.D.R. No. 1, folio 463, one of the Will Records of the County aforesaid, a certified copy of which said Will is filed herewith as Exhibit "No. 2", and prayed may be taken and considered a part hereof, and by the terms thereof provides as follows:

"I give, bequeath and devise unto my beloved sisters, Roberta Thackston, of Whiteville, North Carolina, Sue Thackston Boice, of the same place, and Jean Thackston Taylor, of Beaufort, North Carolina, in equal shares, all of my property, real personal and mixed, and wheresoever situate; to have and to hold the same unto them in fee simple and absolutely, forever."

3. That all the parties to this proceeding are sui juris and are residents of the State of North Carolina.

4. That the real estate hereinbefore described is not susceptible of division without loss or injury to the parties entitled thereto, and that it would be for the best interest and advantage of all the said parties in interest that the property be sold under a decree of your Honorable Court, and that the proceeds accruing from said sale be divided among said parties in interest according to their respective rights.

TO THE END, THEREFORE:

(1) That a decree may be passed for the sale of the real estate hereinbefore described under the direction of your Honorable Court, and that the proceeds thereof may be distributed among the parties entitled according to their respective interests.

(2) And that your Complainants may have such other and further relief as the nature of their case may require.

And as in duty bound, etc.

Amos A. Holter
Solicitor for Plaintiffs

Sue Thackston Boice
Roberta Thackston
Plaintiffs

STATE OF MARYLAND, FREDERICK COUNTY, TO-WIT:

I hereby certify that on this 6th day of August, 1951, before me, the subscriber, a Notary Public of the State of Maryland, in and for Frederick County, personally appeared Sue