

EMORY W. SHAFER and
ALICE M. SHAFER, his wife
157 B & O Avenue
Frederick, Maryland

: NO. 19666 EQUITY
: IN THE CIRCUIT COURT
: FOR FREDERICK COUNTY,
: IN EQUITY

VS:

EMORY T. SHAFER,
GARY L. SHAFER,
CAROLYN A. SHAFER,
LINDA J. SHAFER,
BARBARA B. SHAFER, all infants,
c/o Imogene Orrision,
Harmony, Maryland

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Emory W. Shafer and Alice M. Shafer, his wife, respectfully shows unto your Honors:

FIRST: That Emory T. Shafer, also known as Emory Theodore Shafer, a widower, late of Frederick County, deceased, was in his lifetime and at the time of his death, seized and possessed of a lot or parcel of land with improvements thereon, said lot containing 16,300 square feet, more or less, situate, lying and being on the Yellow Springs to Hamburg road in Tuscarora District, Frederick County, Maryland, being the same lot or parcel of land mentioned and described in a deed from Eugene W. Harley and wife to Emory T. Shafer, said deed dated the 16th day of February, 1959, and recorded in Liber 613, Folio 458, one of the Land Records of Frederick County, Maryland, a certified copy of said deed being filed herewith and marked "Exhibit A".

SECOND: That being so seized, the said Emory T. Shafer, widower, departed this life, intestate, on or about the 16th day of October, 1960, leaving as his next of kin and heirs at law an adult son, Emory W. Shafer, whose wife is Alice M. Shafer, the Complainants, and the Defendants, five grandchildren, all unmarried infants, the children of a deceased son, their names being, Emory T. Shafer, Gary L. Shafer, Carolyn A. Shafer, Linda J. Shafer, and Barbara B. Shafer.

THIRD: That the real estate above mentioned is not susceptible of partition or division among the parties entitled to