Hada S. Keefer, Eleanor May Bare, Elsie Keefer Pumphrey, and John H. Pumphrey, her husband, Edna Knill I'Hara and Ruley O'Hara, her husband, John H. Knill and Mamie V. Knill, his wife, Charles E. Knill, Jr., and Annie Neal Knill, his wife, Franklin R. Knill and Grace P. Knill, his wife.	"	No. 14300 Equity.
Vs.	"	In the Circuit Court
Harry Bare, Charles Edgar Knill, Nellie M. Knill, infant, Elbert Knill, infant, Betty Knill, infant, and Barbara Ann Knill, infant	"	for Frederick County.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Comolaint of Hada S. Keefer, Eleanor May Bare, Elsie Keefer Pymphrey, and John H. Pumphrey, her husband, Edna Knill O'Hara and Ruley O'Hara, her husband, John H. Knill and Mamie V. Knill, his wife, Charles E. Knill, Jr., and Annie Neal Knill, his wife, Franklin R. Knill and Grace P. Knill, his wife, respectfully represents unto your Honorable Court:

FIRST: That a certain John H. Keefer did, on the 16th day of February, 1921, convey to Hada S. Keefer, Ealnor May Bare, Addie S. Knell, and Elsie May Keefer, now Pumphrey, as tenants in common, subject to a life estate in the said John H. Keefer, a certain parcel of land situate, lying and being on the south side of East South Street in Frederick City, Maryland, by deed dated, as aforesaid, on the 16th day of February, 1921, and recorded in Liber No. 355, folio 32, one of the Land Recorus for Frederick County, a certified copy of said deed is filed herewith marked Exhibit No. 1 to this Bill of Complaint, and it is prayed may be taken and considered a part hereof, and also a parcel of land conveyed by James F. Rother et al to Hada S. Keefer et al by deed dated Aug 24, 1939, marked Exhibit #2 to this Bill of Complaint.

SECOND: That the said John H. Keefer is now dead and the grantees in said deed are as follows: Hada S. Keefer, widow, May Bare, whose husband's name is Harry Bare, Elsie May Pumphrey, whose husband's name is John H. Pumphrey, and the following named husband and children, being heirs of Addie S. Knell, one of the grantors in said deed, she having died intestate in the month of July, 1939, namely: Charles Edgar Knill, husband, who resides at Sellman, Montgomery County, Maryland; a daughter,