in the hereinafter described property by reason of the indefinite nature of same, and your Complainants accordingly makes parties to this proceeding Any and All Unknown Heir or Heirs of Lena Wright, deceased; Any and All Unknown Heir or Heirs of Lewis W. Brown, deceased; Any and All Unknown Heir or Heirs of Viola Brubaker, deceased; Any and All Unknown Heir or Heirs of Chester W. Brown, deceased; Any and All Unknown Heir or Heirs of Samuel W. Brown, deceased, to the end that all of their right, title and interest of whatever extent or character may be divested of them and vested in one Clifford B. Lull, Jr., or his designee, Contract Purchaser. The Bill of Complaint alleges in substance as follows:

That Samuel W. Brown, departed this life, testate, on or about the 22nd day of July, 1937, survived by Myrtle A. Brown, Lena E. Wright, Lewis W. Brown, Viola Brubaker, Altha Ramsburg (Althea M. Remsberg), Chester W. Brown, Floyd J. Brown, Bessie Ramsburg (Bessie C. Remsberg) and Gladys L. Lakin; that at the time of his death, he was seized and possessed of a farm, situate, lying and being in Jefferson District, Frederick County, State of Maryland, containing 167 acres of land, more or less, conveyed from Lewis O. Whip, unto Samuel W. Brown, et ux., by deed dated the 3rd day of January, 1911, and recorded in Liber H.W.B. No. 294, Folio 356, one of the Land Records of Frederick County, Maryland.

That Samuel W. Brown, by his last Will and Testament, conveyed unto his daughter, Myrtle A. Brown, a Life Estate, in the hereinbefore mentioned and described farm, and, after the death of the Life Tenant, the farm was to be sold and the proceeds to be distributed to his following named children, Lena Wright, Lewis W. Brown, Viola Brubaker, Altha Ramsburg, Chester W. Brown, Floyd Brown, Bessie Ramsburg and Gladys Lakin.

That Myrtle A. Brown, Life Tenant, was, by a Decree of the Circuit Court for Frederick County, Maryland, dated the 10th day of November, 1937, declared an Incompetent, and Lewis W. Brown, was appointed Trustee to manage her property; Lewis W. Brown, departed this life on or about the 22nd day of March, 1964, and, by ORDER dated the 23rd of June, 1964, Western Maryland Trust Company, a body corporate was designated Substitute Committee of the person of Myrtle A. Brown.

That Lena W. Wright, by Decree of the Circuit Court for Frederick County, Maryland, dated the 9th day of January, 1961, was declared an Incompetent, and

Stewart Hobbs Brown
Attorney at Law
Frederick
Maryland