DONALD F. ECKER 272-B Dill Avenue Frederick, Maryland COMPLAINANT	:	NO 21,394 EQUITY
	:	IN THE CIRCUIT COURT FOR
vs	:	FREDERICK COUNTY, MARYLAND,
EDNA S. ECKER Libertytown, Maryland DEFENDANT	:	IN EQUITY

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BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Donald F. Ecker, by W Jerome Offutt and E Newton Steely, Jr , his Solicitors respectfully shows unto your Honors·

FIRST: That your Complainant, Donald F Ecker and the Defendant, Edna S. Ecker, are adult residents of Frederick County, State of Maryland

SECOND: That by Deed dated the 13th day of March, 1962, Helen F. Mock, unmarried, did grant and convey, in fee simple, unto your Complainant, Donald F. Ecker and the Defendant, Edna S Ecker, who was then his wife, all that lot or parcel of land situate, lying and being on the North side of Main Street, Libertytown, Liberty Election District, Frederick County, Maryland, and adjoining the property of, or formerly of Eugene Hammond on the East and Jesse Pittinger on the West, fronting on said Main Street seventy-five (75) feet, more or less, and running back for an even width to a street or alley on the North, which said Deed is recorded in Liber 664, folio 730, etc , one of the Land Records of Frederick County, the original of said Deed being filed as "Exhibit B" and prayed to be considered as a part hereof.

THIRD: That your Complainant, Donald F. Ecker and the Defendant, Edna S Ecker, were divorced A VINCULO MATRIMONII by a Decree of your Honorable Court the 21st day of March , 1966, a true copy of said Decree being herewith filed as "Exhibit Divorce"" and prayed to be considered as a part hereof, that your Complainant is informed and does thus aver that said divorce changed the ownership of said real estate to a tenancy in common.

FOURTH: That the aforesaid real estate of which the parties seized and possessed is not susceptible to partition in kind, neither can it be divided between the parties entitled thereto without loss or injury

FIFTH: That it would be to the interest and advantage of all the parties

W JEROME OFFUTT
ATTORNEY AT LAW
FREDERICK, MD