

Equity

In the Circuit Court for Frederick County  
sitting as a Court of Equity,  
Ruth Groe and Samuel Groe

vs  
Benjamin B. Dodd, wife, Doda  
Rachel B. Dodd, Chas. W. Doda  
and others

May Term 18<sup>th</sup> 11.  
No. 336 Equity.

Do it, remembered that heretofore to wit, on the  
10<sup>th</sup> day of September, in the Year of Our Lord,  
One thousand Eight Hundred and sixty seven, came into Court here the said Ruth Groe  
and Samuel Groe, and by their solicitors Thomas Donaldson, and Samuel Groe, and  
Joseph M. Salmer, Esquires filed in said Court sitting as a Court of Equity the  
following

Bill of Complaint

To the Honorable Madison Nelson Judge of the Circuit Court for Frederick  
County sitting as a Court of Equity

Humbl<sup>y</sup> Complaining sheweth unto your Honor your Oratrix (Ruth Groe and Samuel  
Groe, her Husband) that some time about the last of December Eight hundred and  
sixty six Benjamin Doda, of Carroll County in the State of Maryland, departed this  
life intestate, leaving a very large and valuable Real Personal Estate, that his Real  
Estate was situated in Frederick County and Carroll County the adjoining Counties

That the said Benjamin Doda in his life time was lawfully married to your  
Oratrix and that from the time of their intermarriage to the time of his death of the  
said Benjamin Doda they lived together as man and wife, and at the time of the death  
of the said Intestate he died leaving no lawful children to inherit his Estate, but  
left your Oratrix his lawful widow, and she asserts that she is justly entitled to have  
in all the Real Estate of which her said late Husband was seized and possessed  
during her life,

Your Oratrix and Orator further state that the said Benjamin Doda  
was for two or three months immediately preceding his death, sick, weak and feeble  
both in body and mind, easily deceived and imposed upon by wicked and designing  
men, and utterly incompetent to dispose of his Property understandingly; that as the  
said Benj. Doda had not any lawful children or descendants of lawful children  
his large Estate descended and belonged to his Brothers and Sisters and their Des-  
cendants whose names will be here after named, as Parties to this Bill, subject  
to the power and legal rights of your Oratrix, as the Widow of the said Deceased.  
Your Oratrix and Orator charge that one Rachel B. Doda, brother of the said  
Benjamin Doda, deceased who resided in the State of Illinois, learning that  
his Brother Benjamin was in very feeble health, and weak and infirm both in  
body and mind, he the said Rachel Doda, left Illinois and came to Maryland  
to visit his sick Brother under the fraudulent pretence of attending to him and  
taking care of his Property and Estate, when in truth, and in fact his sole, and  
only object was to deceive and defraud his brother Benjamin in his weak and feeble  
condition; and more particularly to cheat and defraud your Oratrix out of her just  
and legal rights as the widow of the said Benjamin Doda; and to accomplish  
his wicked and fraudulent purposes and designs, he the said Rachel B. Doda,  
by false statements and fraudulent practises upon his sick, weak and feeble Brother  
managed to get into his possession and management, all the Encumber-