No. 8734. Equity.

Bill of Complaint.

Filed August 15-1944.

William Baer
vs
Stella Baer, Earl Baer,
Ralph Baer and Lee Baer,
Infants, and Caroline S. Yourkins,
Executrix of the last Will and
Testament of Martin L. Yourkins,
deceased.

In the Circuit Court for Frederick County, Sitting as a Court of Equity.

To the Honorable, the Judges of the Circuit Court for Frederick County, Sitting as a Court of Equity.

The Bill of Complaint of Dr. G. Wilmer Yourtee, Who files this Bill on behalf of himself and all other persons Who are Creditors of William M. Baer, late of Frederick County deceased, Who may come in and Contribute to the Costs and expenses of this Suit, respectfully represent unto Your Honors:-

1st. That the said William M. Baer was in his life time and at the time of his death indebted unto your orator, Dr. G. Wilmer Yourtee, in the Sum of Seventy-eight Dollars and Fifty Cents ($78.50), for medical attention and medicines, as will appear by reference to an account duly sworn to and filed herewith as part of this Bill of Complaint marked "Exhibit A", which, together with all other exhibits herewith it is prayed may be taken and considered as a part of this Bill of Complaint.

2nd. That the said William M. Baer, being indebted as aforesaid, departed this life intestate on or about the — day of —— in the year —— leaving Surviving him a Wife, Fannie Baer, Who has since departed this life, and the following Children, to-wit:- Your Complainant, William Baer, Who is an adult Son residing in Frederick County, and the following other Children, to-wit, Stella Baer, aged about Nineteen years; Earl Baer, aged about Seventeen years; Ralph Baer, aged about fourteen; and Lee, aged about Seven years; all of whom reside in Frederick County, Maryland.

3rd. That the said William M. Baer at the time of his death Was Seized and possessed of a piece or parcel of ground Containing Three Acres, more or less, Situated in Frederick County, State of Maryland, Which Was Conveyed to him deed executed by William Kauffman and Annie Kauffman, his Wife, bearing date the 31st. day of March, A.D. 1888, duly recorded among the Land Records of Frederick County, as will fully appear by reference to a certified copy of said Deed filed herewith marked "Exhibit B".

4th. That prior to the execution of the said Exhibit B,