

EQUITY NO. 9203.

Catharine Sulcer, widow, Margaret Hale
James D. Hale and Catharine Hale, his
wife, Fannie Sulcer and John Sulcer, her
husband

No. 9203 Equity.

In the Circuit Court for Frederick
County in Equity.

Vs.

Bertha Hale, widow, Lenda Hoffman and Lewis
Hoffman, her husband; Albert Hale and Minnie
Hale, his wife; Fannie and George
her husband, Marie Hale and Esther
Hale, an infant.

To the Honorable the Judges of said Court--

The Bill of complaint of Catherine Sulcer, widow, Margaret Hale, James D. Hale, and Catherine Hale his wife, Fannie Sulcer and John Sulcer, her husband, all of Frederick County, in the State of Maryland, respectfully shows unto your Honors--

First--That a certain Elizabeth A. Hale, late of Frederick County, in the State of Maryland, died on or about the 2nd day of June, in the year 1910, intestate, in said Frederick County, and leaving as her children and heirs at law the parties hereinafter set forth.

Second--That the said Elizabeth A. Hale, left surviving her the following children and heirs at law--

(a) Catharine Sulcer an adult daughter whose husband's name was Henry Sulcer and who died about 10 years ago leaving her the said Catherine Sulcer, a widow, residing in said Frederick County, Maryland.

(b) Margaret Hale, an adult daughter, unmarried, residing in said Frederick County Maryland.

(c) James D. Hale an adult son, whose wife's name is Catharine Hale, both of whom reside in Frederick County, Maryland.

(d) Fannie Sulcer, an adult daughter, whose husband's name is Catharine Hale, both of whom reside in Frederick County, Maryland.

(e) An adult son, Luther Hale, who died unmarried, and intestate, in or about the month of July in the year 1914, in said Frederick County, Maryland.

(f) An adult son, Daniel Hale, who died about three years ago in Bloomington, in the State of Illinois, leaving a widow surviving him, whose name is Bertha Hale aged about 50 years, and residing in the Bloomington, in the State of Illinois, and also leaving surviving him five children all of whom reside in Bloomington, in the State of Illinois, as follows--

(1) Lenda Hoffman, an adult daughter whose husband's name is Lewis Hoffman, (2) Albert Hale, an adult son whose wife's name is Minnie Hale, (3) Fannie an adult daughter, whose husband's is George (4) Marie Hale, an adult daughter, unmarried and (5) Esther Hale, an infant daughter, aged about 18 yrs.

(g) Jennie Mumford, an adult daughter, whose husband's name is Richard Mumford, both of whom reside in Frederick County, and the said Richard Mumford having died leaving no last will and testament, and no children, by the said Jennie Mumford, the said Jennie Mumford having died intestate.

Third That the said Elizabeth A. Hale, in her lifetime and at the time of her death was seized and possessed in fee simple of certain real estate situated in Jefferson District, in said Frederick County, State of Maryland, and more particularly described in a deed from Daniel Baker, to the said Elizabeth Hale, dated on the 13th day of May in the year 1865 and duly recorded in liber B.G. F. No. 9, folios 1 etc., one of the land records for said Frederick County, a certified copy of which said last mentioned deed is filed herewith as a part hereof and marked exhibit No. 1.

Fourth--That there are no liens on said real estate unpaid and no debts by the said Elizabeth A. Hale that are on record in said Court; although a certain mortgage appears unreleased on said records which said mortgage was given by David Hale and wife unto Daniel Baker and which said mortgage is dated on the 30th day of March in the year 1863, and duly recorded in liber E. S. No. 2 folio 668 etc., one of the land records for Frederick County, in the sum of \$294.14. And your orators allege that the said mortgage has been duly and fully paid together with the interest thereon and should and will be released, the said Daniel Baker having deeded all his interest in said property unto the said Elizabeth Hale as fully appears by reference to Exhibit No. 1 of this bill. (2) The mortgage of Elizabeth A. Hale and husband to Andrew Kessler, Andrew M. Thomas and Abraham Hemp for \$300.00 dated May 14th 1863, and duly recorded in liber B. G. F. No. 9 folios 1 etc., one of the land records for Frederick County which said last mentioned mortgage and interest has been fully paid and satisfied, and should and will be released on the land records of this Court. (3) A mortgage from David Hale and Elizabeth A. Hale, his wife, to Margaret Boteler for the sum of \$300.00 dated on the 13th day of January in the year 1877, and duly recorded in liber T. G. No. 6 folios 539 etc., one of the land records for said Frederick County, which