

while your Complainant is informed and believes that the debts owing by said estate on claims unsecured by liens, amount to approximately Six Thousand Dollars (\$6,000.00).

5. That your Complainant is informed and avers that the said Charles K. Summers has not left a personal estate sufficient to pay his debts and the costs of administration and has instituted this suit, as one of his creditors to the end that the above described real estate may be sold and the proceeds applied to the payment of his debts, including the claim of your Complainant.

6. That on the death of the said Charles Keefer Summers, intestate, the title to the above described real estate descended to and vested in Minnie M. Summers, his widow, an adult over the age of twenty-one years, and Ethel Summers, aged fifteen years, Dorothy Summers aged eleven years and Charles H. Summers, ages seven years, his children, all of said children being infants under the age of twenty-one years, and the said widow and infants being residents of Frederick County and being the only heirs-at-law of the said Charles K. Summers.

Wherefore your Complainant prays;

(1). That the aforesaid real estate of which the said Charles K. Summers died seized and possessed, may be sold for the payment of his debts and that your Honors will pass a decree appointing some suitable person trustee to make sale of said real estate, or so much thereof as may be necessary, and directing the same to be sold, and that the proceeds arising from such sale, after the payment of costs and expenses, be distributed to the payment of the debts of the said Charles K. Summers in the order of their legal priority, and the surplus, if any, to the person or persons entitled thereto;

(2). And that your Orator may have such other and further relief as the nature of the case may require.

May it please your Honors to grant unto your Orator the writ of subpoena directed to the said Minnie M. Summers and Lewis Putman, Administratrix and Administrator of the estate of Charles K. Summers, deceased, Minnie M. Summers, widow, individually, and Ethel Summers, Dorothy Summers and Charles H. Summers, Infants, and the Commercial State Bank of Frederick, Maryland, judgment creditor, all of whom reside in Frederick County, Maryland, commanding them and each of them to be and appear either in person or by solicitor in your Honorable Court on or before a certain day to be named therein to show cause, if any they have, why a decree ought not to be passed as prayed.

And as in duty, etc.

(Filed January 9, 1923)

Edgar H. McBride.  
Solicitor for Complainant.

"EXHIBIT NO. 1"

At the request of Charles K. Summers, the following Deed is received for record and recorded March 18th, 1916, at 2 o'clock P.M.

Test; - Eli G. Haugh, Clerk.

THIS DEED, made this 14th day of March, in the year Nineteen Hundred and Sixteen, by us, Jacob E. Summers and Mary E. Summers, his wife, of Frederick County, State of Maryland.

WITNESSETH; - That for and in consideration of the sum of Ten Dollars and other good and valuable considerations to us in hand paid, the receipt of which is hereby acknowledged, we, the said Jacob E. Summers and Mary E. Summers, his wife, do hereby grant and convey in fee simple unto Chas. K. Summers, of Frederick County, State of Maryland, all that part or parcel of the tract of land situated on the Northeast side of the Frederick and Hamburg Pike, in Tuscarora District, in Frederick County, aforesaid, and bounded as follows; Being about one-half acre of land, improved with two story carriage house, being part of the same tract of land that was conveyed to Jacob E. Summers by deed dated