Ex

BILL OF COMPLAINT

L. Cramer Powell and Irving S. Albaugh, partners trading as (Powell and Albaugh) and N. Dorsey Norris	"	
VS.	"	
Maria Smith, widow; Lottie Richardson, unmarried; Elizabeth Valentine, widow; Lottie Gardner and William Gardner, her husband; Annie Brown and Philemon Brown, her husband; John Duppins and Edna Duppins, his wife; Alice Duppins, unmarried; William Duppins, and Mazie Duppins, his wife; James Duppins and Gertie Duppins, his wife; Clarence Duppins and Maggie Duppins, his wife; Olivia Dixon and Bates Dixon, her husband; Perry Richardson and Annie May Richardson, his wife; Ella Richardson unmarried; William Richardson, unmarried; Norman Richardson, unmarried; and Margaret Waters and Waters, her husband;	"	No. 11986 Equity 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, Maryland, sitting as a Court of Equity:

Your orators Complaining, says:-

First: That a certain Charles G. Richardson, died intestate, who was a resident of Frederick County, Maryland, and well up in years, in June 1929.

Second: That the said Charles G. Richardson whose Wife Laura Richardson had died about eight years before, left surviving him Maria Smith a sister, whose husband is dead, and and the sister Lottie Richardson who is unmarried, and the following nieces and nephews,- Elizabeth Valentine, widow; Lottie Gardner married to William Gardner; Annie Brown, married to Philemon Brown; John Duppins whose wife's name is Edna Duppins; Alice Duppins, unmarried; William Duppins whose wife's name is Mazie Duppins; James duppins whose wife's name is Gertie Duppins and Clarence Duppins whose wife's name is Maggie Duppins; all children of one Jane Duppins, a deceased Sister of said Chales G. Richardson; Olevia Dixon who is married to Bates Dixon. and Perry Richardson whose wife's name is Annie May Richardson and Ella Richardson unmarried; all children of one Richard Richardson, a deceased brother; William Richardson, unmarried; and Norman Richardson, unmarried, two sons of one William Richardson, a deceased brother; and Margaret Waters who is married to Waters, child of John Richardson, a deceased brother.

Third: That the above named parties are the heirs at law of the said Charles G. Richardson, deceased.

Fourth: That the said Maria Smith, Lottie Richardson, Elizabeth Valentine, Lottie Gardner, William Gardner, John Duppins, Edna Duppins, Alice Duppins, William Duppins, Mazie Duppins, are residents of Frederick County, Maryland that Annie Brown and Philemon Brown are residents of Baltimore County, Maryland, that Clarence Duppins, Maggie Duppins, and Ella Richardson are residents of Baltimore City, Maryland, that James Duppins, Gertie Duppins, Olevia Dixon, Bates Dixon, Perry Richardson, Annie May Richardson, William Richardson, Norman Richardson, Margaret Waters and Waters her husband residents of Pittsburgh, Pennsylvania and non residents of the State of Maryland, and that all of said above named defendants are adults over 21 years of age.

Fifth: That at the time of his death, the said Charles G. Richardson was seized and possessed of a certain parcel of real estate consisting of two lots or pieces of land with a dwelling house and buildings thereon situated about two miles from Unionville, in Frederick County, Maryland, and being the same real estate which is described in a deed from John A. Richardson and others to Charles G. Richardson, dated November, 18, 1896, and recorded in Liber J.L.J.No. 14, folio 653 etc.,one of the Land Records of Frederick County, Maryland, duly a certified copy of which deed is filed herewith as part hereof and marked "Exhibit A".

Sixth: That the estate of the said Charles G. Richardson is indebted unto your Orators Powell and Albaugh, who are funeral directors in the sum of $90.00 as evidenced by their account