

AMENDED BILL OF COMPLAINT AND AFFIDAVIT THERETO.

Roberta V. Baumgardner	:	No. 14,253 Equity
vs.	:	In the Circuit Court
Marjorie Davidge Mannix,	:	For Frederick County
Individually and as Execu-	:	In Equity.
trix of the Last Will and	:	
Testament of Robert Harold	:	
Davidge, deceased.	:	

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Amended Bill of Complaint of Roberta V. Baumgardner, filed in pursuance to an order of your Honorable Court passed the 1st day of September, 1943, respectfully shows:

1. That she is a resident of Frederick City, Maryland, where she has resided all her life, and the defendant is a resident of the State of New York, being now represented in this cause by Parsons Newman, Esquire, her Solicitor of Record.

2. That on June 7, 1940, Robert Harold Davidge departed this life in Frederick, Maryland, being at the time a widower, and left surviving him his sister, the defendant, Marjorie Davidge Mannix, and certain nephews, as also your Oratrix, who is the stepdaughter of the said Robert Harold Davidge, being the daughter of his deceased wife, Georgia Kennedy Davidge.

3. That there has been duly probated in the Orphans' Court of Frederick County his Last Will and Testament, bearing date October 28, 1929, in which the defendant, Marjorie Davidge Mannix is designated as Executrix and is named as principal beneficiary, a certified copy of which is herewith filed, marked "Exhibit October Will" and prayed to be considered as a part hereof.

4. That the mother of your Oratrix, Georgia C. Kennedy, was first married to Jeremiah J. Kennedy, who died on or about September 17, 1909, intestate, leaving as his only heir at law and next of kin, his daughter, your Oratrix. That on July 1, 1910, the said Georgia C. Kennedy married the said Robert Harold Davidge and they and your Oratrix lived in Frederick City, Mary-