

BILL OF COMPLAINT

Sadie E. Kimmel, widow,
and Sadie E. Kimmel,
mother and next friend
of William L. Kimmel,
infant.

No. 16133 Equity
In the Circuit Court
for Frederick County,
Maryland

vs.

William L. Kimmel, infant.

TO THE HONORABLE JUDGES OF SAID COURT.

The Bill of Complaint of Sadie E. Kimmel, widow, and Sadie E. Kimmel, mother and next friend of William L. Kimmel, infant, respectfully shows:

1. That William W. Kimmel, late of Frederick County, Maryland, departed this life intestate on October 11, 1946, seized and possessed of all that parcel of land situated in New Market District, Frederick County, Maryland, containing sixty-nine and one-fourth acres, more or less, together with all the buildings and improvements thereon, and more particularly described in the deed from William S. Kelley and Sallie A. Kelley, his wife, dated March 29, 1934 and recorded in Liber 390, folio 362, one of the land records of Frederick County, Maryland, as by reference thereto will more fully and at large appear; a certified copy of which said deed is filed herewith and marked "Plaintiffs' Exhibit No. 1" and prayed to be considered as part hereof.

2. That the said William W. Kimmel died intestate, and that the said Sadie E. Kimmel, his widow, duly qualified as administratrix of his estate in the Orphans Court of Frederick County, Maryland, on October 21, 1946, and that his personal estate is sufficient to pay all of his debts.

3. That the said William W. Kimmel left surviving as his only heirs-at-law the said Sadie E. Kimmel, his wife, and the said William L. Kimmel, his son, who was born on January 23, 1938.

4. That on the 3d day of April, nineteen hundred and forty-seven, the said Sadie E. Kimmel, individually, and the said Sadie E. Kimmel, mother and next friend of William L. Kimmel, infant, entered into a written contract of sale with Raymond C. Warfield