

"BILL OF COMPLAINT"

JANE ANNE SMITH, widow, and OLIVE JEAN BROWN	:	No. 18048 Equity
	:	In the Circuit Court for
VS.	:	Frederick County, Maryland,
EDWARD H. SCHAFFER	:	In Equity.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Jane Anne Smith, widow of Wilson Porter Smith, and Olive Jean Brown, wife of Lloyd J. Brown and only child of Wilson Porter Smith, Complainants, by Mathias and Mathias, their solicitors, respectfully shows:

1. That Wilson Porter Smith, the husband and father respectively of your Complainants, departed this life on Friday, December 3, 1954, in the City of Baltimore, Maryland, leaving a Last Will and Testament dated November 13, 1954, probated in the Orphans' Court for Baltimore City on the 8th day of December 1954 and recorded in Liber L.C.S. No. 254, folio 157, one of the Will Records in the Office of the Register of Wills for Baltimore City, the terms and provisions of which provided

"I hereby give, bequeath and devise unto my wife, Jane Anne Smith, of the City of Baltimore, State of Maryland, all my property, real, personal and mixed, of whatsoever nature, and wheresoever located, for her sole and separate use during the term of her natural life, with full power and disposition during her life time, and thereafter, the balance of said estate remaining at her death to belong to my daughter, Olive Jean Brown absolutely."

a certified copy of which Last Will and Testament is filed herewith, as a part hereof, and marked "Exhibit A".

2. That during the year 1931 the said Wilson Porter Smith purchased a certain lot or parcel of ground situate, lying and being on both sides of the road leading from the Saw Mill Bottom Road to High Knob in Braddock District, Frederick County, State of Maryland, from a certain Edward H. Schaffer; that the purchase price for the said lot or parcel of ground was \$700.00 which the said Wilson Porter Smith paid unto the said Edward H. Schaffer at the time of the said purchase and that immediately upon

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