To the Honorable Madison Nelson Judge of the Circuit Court for Frederick County, Sitting as a Court of Equity The Bill of Complaint of George Smith of Frederick County most Respectfully Shows - to your Honor that on the Seventh day of September eighteen Hundred and Fifty two at the instance & request of a certain George Koontz of the County aforesaid, he loaned to the said George Koontz, the sum of fifteen Dollars in Cash as will appear by his account thereof properly authenticated by your Complainant, marked Exhibit A and filed herein as a part of these proceedings which said Exhibit together with all other Exhibits herein filed, your Complainant prays may be taken, and considered as a part of this Bill of Complaint - Your Complainant further shows, that on or about the 28 day of September, eighteen Hundred and fifty two the said George Koontz died intestate, in the County aforesaid - Your Complainant further shows - That on or about the fourth day - of October, in the same year, letters of administration upon the personal Estate of said Deceased, were duly granted by the Orphans Court of Frederick County to Worthington Ross, who has entered upon the Exchange of his Duties as administrator, as will appear upon reference to the exemplification of his letters herewith filed - and marked Exhibit B your Complainant further shows that at the time of the death of the said George Koontz he was seized & possessed of Real Estate in the Town of Frederick to a large amount as will appear by the Copy of the Deed to the said George Koontz for the same herewith exhibited, marked Exhibit C your Complainant further States that the said George Koontz, at the time of his death - was very heavily indebted That his personal Estate is totally inadequate, & insufficient for the payment of his debts: and that it will require - the sale of a part, if not the whole of his Real Estate, for that purpose your Complainant further states, that the said George Koontz at the time of his death, left a widow by the name of Margaret Koontz and the following children Ann Maria Koontz, intermarried with John P Keller, George S Koontz, Elizabeth Koontz, intermarried - with Thomas Wade Charles F Koontz Fanny R. Koontz, James - Koontz & Sophia M. Koontz, all of whom are minors under the age of Twenty one years with the exception of Mrs Keller Mr Wade & George S Koontz, and all of whom reside in the County of Frederick with the exception of Geo S Koontz who is now residing in the - City of Baltimore. In tender consideration whereof, and for - as much as your Complainant is remediless in the premises by the strict rules of Common law and only relievable in a Court of Equity, where matters of this kind are properly Cognizable, and to the end that the said Margaret Koontz Worth Ross adm of Geo Koontz, John P Keller & Ann Maria Keller his wife George S Koontz Thomas Wade, and Elizabeth Wade his wife Charles F Koontz Fanny R Koontz James Koontz & Sophia Koontz, may true, and sufficient answers make (the adults on their Corporal Oaths, and the infants by their guardian, to the allegations in your Complainants Bill, and to the further

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