

Bill

To the Honorable the Judges of the Circuit Court for Frederick County sitting as a Court of Equity.

The Bill of Complaint of Robert St Puddleton and Fanny Puddleton his wife of the State of Virginia, sheweth - That Dr William Waters, late of Frederick County State of Maryland deceased by his last Will and Testament, duly executed to pass Real Estate, devised all his Estate real, personal, and mixed, to his wife Frances C. Waters, during her life, and after her death to his two daughters, Susan, wife of Dr J S Libero and Anne P. Waters in fee simple, all of which matters will more fully and at large appears. ~ reference being made to a certified Copy of the said Will herewith Exhibited marked Exhibit No 1, which with all other Exhibits herein ~ after produced, Your Complainants pray may be taken as part of this their Bill of Complaint. ~

Your Complainants further state that the said Dr William Waters died in the year Eighteen hundred and fifty two without making said Will, and that his wife and devisee for life Frances C. Waters, died after the date of said will and several years before the death of the said testator Dr William Waters. ~

Your Complainants further state that the said William Waters at the time of his death, was seized in fee of all that part of a Tract of Land called Rocky Spring situate in Frederick County State of Maryland, containing Two hundred and twenty acres and three fourths acres of Land more or less, which had been heretofore conveyed by Egnardoub and William St Doub Exrs of the Will of Joshua Doub to said William Waters by deed, a certified Copy of which deed is herewith Exhibited marked Exhibit "B" and also died seized of all those parts of tracts of Land situate in said County and State, called "The Safest Way" containing Eight acres two rods and thirty six perches of Land more or less heretofore conveyed by David Kemp to the said William Waters by deed, a Copy whereof is herewith Exhibited marked Exhibit "C", and also died seized of a part of a Tract of Land situate in said County and State known as Lot No 3, part of Kemp's Discovery, containing fifteen acres and three square perches of Land, heretofore conveyed by Joseph S Miller to said William Waters, a Copy whereof is herewith Exhibited marked Exhibit "D". ~

Your Complainants further state that the said William Waters by his single Bill dated on the seventh day of January, in the year Eighteen hundred and fifty one, being indebted to Egnardoub as Executor and Trustee of Cathon Doub, in the sum of Two thousand, two hundred and ten dollars to be paid on the 12<sup>th</sup> day of November 1857, and also in the further sum of Three thousand seven hundred and Ninety dollars to be paid on the 12<sup>th</sup> day of November 1852, with interest on each of these two sums, to be computed from the 1<sup>st</sup> of April next succeeding the date of said note, and payable semiannually - did in conjunction with his wife Frances C. Waters, convey by deed of Mortgage to said Egnardoub Executor and Trustee as aforesaid all those Lands heretofore conveyed by said Egnardoub and William St Doub Executors to said William Waters, by deed, a Copy of is hereinbefore Exhibited as Exhibit "B", with conditions to be void on the payment of the said sums of money therein recited, at the times and in the manner therein provided - All of which matters will be more fully seen by reference to a Copy of said deed of Mortgage herewith Exhibited marked Exhibit "E". ~

Your Complainants further state and so charge - that the sum of

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