

Your Complainant charges is a lien on that portion of the said Lands so devised to the said Francis.

And your Complainant charges that the said Francis Jones being indebted as aforesaid unto your Complainant, and also unto divers other persons in large sums of money, and having real and personal Estate of great value, departed this life in the Month of July in the year Eighteen hundred and sixty nine, intestate, leaving a widow named Ellen Jones and the following children his heirs at law, to whom the lands aforesaid descended, viz, Frank B Jones, Albert Jones, Married to Margaret Ann Poole ~ John Downey Jones, William Downey Jones, Edward Jones and Charles Jones ~ Mrs. Ellen Jones, the widow of said Francis S. Jones, Albert Jones and Margaret A Jones his wife, John Downey Jones, William Downey Jones Edward Jones and Charles Jones reside in Frederick County State of Maryland, and that said William D. Edward and Charles Jones are minors under the age of twenty one years, that Frank B Jones, is now Composit Mentis, unable to take care of his person or estate, and is at this time in St. Agnes Hospital in the City of Baltimore, State aforesaid. ~

And your Complainant further charges that letters of Administration upon the personal Estate of the said Francis S. Jones, has been granted by the Orphan's Court for Frederick County, unto Albert Jones, who has duly entered upon the discharge of his trust, as will appear by letters of Exemplification herewith Exhibited marked Exhibited.

Your Complainant further charges that the personal Estate of the said Francis which has come into the hands of the said Albert Jones, Administrator as aforesaid, is of great value, but your Complainant is informed, and so charges, that the same is not sufficient to discharge all the debts, due and owing by the said intestate at the time of his death. And your Complainant is advised that the said personal estate, in the hands of the said Albert Jones administrator ought to be applied to the payment of the claims of your Complainant, and of the other Creditors of the said Francis S. Jones, so far as the same will extend, and that any deficiency in the said personal estate, ought to be supplied by a sale of the real Estate of the aforesaid debtor.

Your Complainant further charges that a Petition was filed in your Honorable Court for the purpose of having the said Frank B Jones declared a Lunatic, that a Commission in the nature of a Writ de Lunatico Inquirendo was issued, and an inquisition found thereon, that said Frank B Jones was of unsound mind and incapable of taking care of his person or estate, and by a decree passed by your Honorable Court, Albert Jones was appointed Trustee of the person and estate of the said Frank B Jones. ~

To the end therefore that the defendants hereinafter named, may answer the several matters and things stated in the foregoing Bill of Complaint, as fully and particularly as if herein again repeated, and they were thereunto specially interrogated, and that the real estate mentioned in the proceedings, whereof the said Francis S. Jones died seized and possessed, may be sold, or so much thereof as may be necessary, may be sold for the payment of your Complainant's Claims, and for the Claims of all other Creditors of the said Francis, who may come in and contribute to the expenses of this Bill together with all the interests that may be due thereon, and that your Complainant may have such further and other relief as the nature and equity of his Cause may require ~

May it please your Honors to grant unto your Complainant the writ of Subpoena against the said, Albert Jones Administrator of the goods chattels &c of Francis Jones dec^d. Mrs. Ellen Jones, Albert Jones and Margaret A Jones his wife John Downey Jones, William D. Jones, Edward Jones, Charles Jones and Mrs. Matilda Swope of Frederick County, and Frank B Jones of the City of Baltimore, Commanding them to appear in this Court on some certain day to be named therein, to answer the premises, and to abide by and perform such decree as may be passed thereon. ~ And as in duty bound. ~

Filed Dec. 3^d 1869 ~

Wm. Ross }
Charles Ross } Collectors for
Complainants