

Bill of  
Complaint

To the Honorable the Judges of the Sixth Judicial Circuit of the State of Maryland,  
Sitting in the Circuit Court for Frederick County, as a Court of Equity.

The Bill of Complaint of Stephen A. Thomas of Frederick County State of Maryland,  
who sues in behalf of himself, and all other Creditors of Richard Thomas late of Frederick  
County, State of Maryland, deceased, who may hereafter come in under the decree and  
contribute to the Expenses of this Suit, Shows ~

That a certain Richard Thomas by his promissory note dated January Twentieth  
in the year Eighteen Hundred and Sixty Eighth, Payable six months after date, pro-  
-mised to pay to your Complainant the sum of Four Hundred dollars with interest from  
date, as will be seen by the said promissory Note herewith Exhibited Marked Exhibit  
"A", which Exhibit with all other Exhibits hereinafter produced, your Complainant  
prays may be taken as part of this his Bill of Complaint, and which Note your Complainant  
states is still due owing and unpaid ~

Your Complainant further states that the said Richard Thomas was at the time of  
his death, seized and possessed in fee, of all that Farm situate in Frederick County  
State of Maryland, being part of a tract of land situate in said County and  
State, called "Locust Bottom", containing Two Hundred and Ninety five acres of  
Land more or less - And which Farm was devised to him the said Richard Thomas  
by the will of his father Otto Thomas deceased, as will be seen by an Extract from the will  
of said Otto Thomas, herewith Exhibited, Marked Exhibit "B". ~

Your Complainant further states that said Richard Thomas, made his will, dated  
on the twenty ninth day of August Eighteen Hundred and Seventy, and devised his  
estate, real and personal, to his wife Mary A. Thomas, and constituted Archibald  
P. Snuffer Executor thereof, as will be seen by a Certified Copy of said Will here  
with Exhibited Marked Exhibit "C". ~

Your Complainant further states that Archibald P. Snuffer accepted said  
trust, and has entered upon his duties as Executor, as will appear by a Copy of  
letters of Exemplification, herewith Exhibited, Marked Exhibit "D". ~

Your Complainant further states that the said Richard Thomas died  
intestate as to his real estate - His will not being attested by three or more witness-  
es, according to law, and that said Real Estate descended to his heirs at law. ~

Your Complainant, further states that the said Richard Thomas died on or about  
the Eleventh day of September in the year Eighteen Hundred and Seventy - leaving  
a widow named Mary A. Thomas, entitled to dower in said lands, and the following  
Children to wit ~

- 1<sup>st</sup> Charles B. Thomas, residing in Baltimore -
- 2<sup>nd</sup> Richard Thomas residing in Frederick County Maryland, both of whom are Adults.
- 3<sup>rd</sup> Ada Thomas, Minor ~
- 4<sup>th</sup> John B. Thomas, Minor ~
- 5<sup>th</sup> Frank Thomas, Minor ~
- 6<sup>th</sup> William Thomas, Minor ~
- 7<sup>th</sup> Fanny Thomas, Minor ~
- 8<sup>th</sup> Robert Lee Thomas, Minor ~
- 9<sup>th</sup> Mary J. Thomas, Minor, all of whom reside in Frederick County State  
of Maryland. ~

Your Complainant further state that the personal Estate of the said Richard  
Thomas, is wholly insufficient for the payment of his debts ~ And that a sale  
of the real estate of which the said Richard Thomas died seized, and the ap-  
-plication of the proceeds of Sale of such real estate will be necessary to  
pay his debts. ~

It is the End therefore that the defendants hereinafter named may answer

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