Bill

No. 3680 Equity

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

The Bill of Complaint of John C Warrenfeltz of Frederick County who sues as well for himself as all other creditors of Andrew Drayer late of Frederick County deceased who will come in and contribute to the expenses of this suit respectfully shows that a certain Andrew Drayer late of Frederick County deceased was in his life-time indebted unto your Orator in the sum of Twenty seven dollars on his certain bill obligatory or note under seal dated on the 22nd day of February in the year 1869 for the payment to your Orator or order of the aforesaid sum of money on or before a certain day long since passed as by your Orator's "Exhibit A" filed in this cause and which together with all other Exhibits your Orator prays may be taken and considered as a part of this his bill of Complaint will more fully appear and which said single bill is as yet wholly unpaid and due and owing to your Orator.

And your Orator further charges that the said Andrew Drayer being so indebted as aforesaid unto your Orator and also unto divers other persons in large sums of money and having Real and Personal Estate of considerable value in Frederick County aforesaid departed this life some time in month of in the year 1869 after having duly made and executed his last Will and testament in writing a certified copy of which is hereunto filed marked "Exhibit B" by which said will the said Andrew Drayer devised and bequeathed as follows to wit: "and after my debts and funeral charges are paid and my wifes third taken out I devise and bequeath as follows Item, I give and bequeath (according to the conditions hereinafter named) to my daughter Christina wife of William Miller twelve Acres of Land during her life only and after her decease to her children in fee simple, in the event of my daughter Christina dying without any heir then the aforementioned twelve acres of Land should be equally divided between the heirs of Mary my daughter and the heirs of Emanuel Drayer, the twelve acres of Land been given and bequeathed shall be taken from that part of my farm which lies towards the East and shall join the Land now owned by Jonathan Stottlemyer and shall be struck off and separated from the residue of my farm by a line running nearly North & South. Item, I give and bequeath to Mary my daughter one half of the residue of my Estate both Real and Personal to the said Mary and her heirs. Item, I give and bequeath to my Grand Children Noah & Anna (the heirs of Emanuel Drayer) the remaining portion or balance of my Estates both Real and Personal to be divided between them in equal portions share and share alike, that by said will the said Andrew Drayer appointed John A. Wilson to be his sole Executor that the said John A Wilson after the death of said Andrew Drayer duly renounced and declared in writing to act as Executor of said Will as will appear by a certified copy of his said renunciation filed hereunto marked "Exhibit C" and that administration with the Will annexed of the Personal Estate of said deceased was duly granted by the Orphans Court of Frederick County to George K Shellman who in virtue thereof has possessed himself of the Personal Estate of the said deceased & sold the same in accordance with an order of the Orphans Court aforesaid and your Orator is informed and believes that the said Personal Estate is wholly insufficient to pay the debts due and owing by said intestate at the time of his death, and your Orator further charges that the said Andrew Drayer at the time of his death left a widow who is since deceased