

Margaret Ann Sophia Hargate
& William Hildebrand Executors with
Lewis A. Hildebrand of the last
Will & C. of John Hildebrand late of Frederick
County &c. & Lewis A. Hildebrand

No. 4219 Equity
In the Circuit Court for Frederick County
V. C. Term 1870

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

The Bill of Complaint of Margaret Ann Sophia Hargate and William Hildebrand her husband of Frederick County, who bring this suit as well for themselves as for all others of the heirs, Personal Representatives, Legatees and devisees of John Hildebrand late of Frederick County &c. unto your Honor's humble and respectfully represents & shews

That your Oratrix Margaret Ann Sophia Hargate is a daughter of John Hildebrand late of Frederick County &c. that the said John Hildebrand departed this life on or about the 17th day of June 1873, being seized and possessed at the time of his death of both Real and Personal Property situated in Frederick County, expressed

That the said John Hildebrand also left at the time of his death, a Last will & Testament duly executed to pass both Real and Personal Estate, that by said last will & Testament after the Payment of debts and funeral Charges the said John Hildebrand devised and bequeathed all his Property and Estate both Real and Personal, to his wife Lydia for and during her natural life and after her death share and share alike to your Oratrix Margaret Ann Sophia, William Henry Lewis Albert John Thomas Josiah Edward Morgan Milner Lydia Ann, Elizabeth and Martha Loretta his Children and Jennette Catharine and Charles E. Hargate his Grand Children, Children of a deceased daughter, Louisa Catharine who had intermarried with a certain Hiram Hargate, all of which will more fully appear by reference to a Certified Copy of said last will & Testament of the said John Hildebrand herewith filed and exhibited as a part of this Bill of Complaint marked Exhibit A.

That the said Lydia Hildebrand and wife of the said John Hildebrand is now dead having departed this life on or about the 28th day of April A. D. 1876.

That during the lifetime of the said John Hildebrand to wit on the 27th day of January A. D. 1868, one of his said Children to wit, William H. Hildebrand being indebted unto him the said John Hildebrand on the sum of One thousand Dollars, and intending to secure the Payment thereof, did on the 19th day of March 1868 together with his wife Mary Ann Rebecca who has since departed this life execute unto him the said John Hildebrand his Seed of Mortgage upon certain Real Estate in Frederick City which is fully described in said deed of Mortgage, to which said deed there is a condition annexed that is to be paid on the Payment by the said William H. Hildebrand, Mary Ann Rebecca his wife to said John Hildebrand the aforesaid sum of One thousand Dollars with interest thereon from the 29th day of February 1868, on or before the 29th day of February 1869, as by the Original of said deed of Mortgage marked Exhibit B and filed herewith as part of this Bill will more fully

And, your Oratrix and Orator Charge that no part of the principal sum of One thousand Dollars intended to be secured by the said deed of Mortgage has ever been paid, although they admit that some of the interest which has accrued thereon has been paid by the said William H. Hildebrand. And your Oratrix and Orator further Charge that there was due and still owing upon the said Mortgage debt, upon and on account of Principal and interest, on the 19th day

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