

Supplemental
Bill of
Complaint.

Maesche Bros. & Co.

vs.
John W. Sefton
et al.

No. 3941 Equity.

In the Circuit Court for Frederick
County in Equity.

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

The supplemental Bill of Complaint of Leonard R. Maesche, James
J. Maesche and Albert Foreman, trading under the name, firm and
style of Maesche Bros & Co. humbly shew, that heretofore they filed their bill
of Complaint in this Court against a certain John W. Sefton and William
Sefton of Frederick County (praying) amongst other things for a sale of
certain premises to satisfy their Mechanics Lien as in said bill is
particularly set forth; to which bill the said Defendants answered
and other proceedings were had as by the said proceedings now
in this Court will appear. And your Complainants state by way
of Supplement to their aforesaid bill of Complaint, that since the
filing of said bill and answer, the said William Sefton has
deceased this life intestate, leaving as his heir at law, a widow
Mary Sefton, a daughter Mary Ann Sefton, a son Martin S. Sefton,
the name of whose wife is S. Catharine S. Sefton, a daughter
two Savilla, now the wife of Frederick White, a son John
W. Sefton, the name of whose wife is Deborah L. Sefton, a
daughter Margaret now the wife of Charles V. Foreman
and a daughter Sarah C. now the wife of Joseph White,
all of whom are adults and reside in Frederick County.
Your Complainants further state by way of Supplement to their ori-
ginal bill, that said John W. Sefton made and executed his deed
of mortgage of said premises to said Frederick White and William
Sefton which mortgage is subject to and entitled to payment after
your Complainants Lien is paid and satisfied, and your Complain-
ant herewith file as part of this supplemental Bill a certified copy of
said mortgage marked Exhibit No. 1, to Supplemental Bill of Com-
plaint. And your Complainants further state that said Martin S.
Sefton and said Frederick White are the administrators of the goods
&c. of said William Sefton now deceased. Your Complainants
further state that said Frederick White has made a deed of
trust of all his property of all kinds to a certain William
J. Black and William White a certified copy whereof is here-
with filed as part of this Supplemental Bill marked Exhibit
No. 2, to Supplemental Bill of Complaint, and that by said
deed of trust all the interest of said Frederick White in said
Mortgage passed to his said trustees. To the end therefore, that
the said John W. Sefton may answer this Supplemental Bill, and that
the other Defendants hereinafter named may answer as well the
matter charged in the original bill of Complaint as in this Sup-
plemental Bill, and that your Complainants may have such relief
against them as is prayed by their original bill of Complaint against
the original defendants therein - and that said property may be sold