

No 4168 Equity.

Samuel B Ecker & wife  
and Others

vs  
William Leakins & wife  
and Others

No 4168 Equity.  
Suits Circuit Court for Frederick  
County sitting as a Court of Equity

Bill of  
Complaint

To the Honorable the Judge 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 Samuel B. Ecker and Martha C. Ecker his wife  
Josiah Sowers and Annie Sowers his wife and Daniel Leakins of  
Frederick County State of Maryland respectfully shew to your Honors,  
That a certain Dennis Leakins of said County and State being seized of a  
certain parcel of Land situate in Frederick County, State of Maryland  
which he purchased of Jacob Fox and which said Land was conveyed  
to him by the said Jacob Fox & wife by deed dated on the 28th day of  
April 1877 did intestate on or about the nineteenth day of May, in the  
year Eighteen Hundred and Seventy Six and then at the time of his  
death, was seized and possessed of said lands mentioned aforesaid  
except certain parts thereof which he had previously conveyed by  
deeds to Basil W. Stutely, Jacob W. Stutely, Samuel Stutely, and to Daniel  
P. Zimmerman & Others, respectfully. All of which will appear by  
reference to certified copies of said deeds herewith Exhibited marked  
Exhibits, Nos. 1, 2, 3, 4 & 5, which your Complainants pray together  
with all other Exhibits hereinafter produced may be taken and considered  
as part of this their Bill of Complaint. Your Complainants further  
state that the said Dennis Leakins had three Brothers of the whole blood  
namely, Thomas Leakins John Leakins and Amos Leakins. That  
Thomas Leakins died before the said intestate leaving the following  
descendants Viz, 1. William Leakins married to Catharine Bolowes,  
2. Lewis A Leakins, 3. Martha C. now the wife of Samuel B Ecker  
4. Elizabeth, now the wife of Daniel Boker, 5. Annie now the wife  
of Josiah Sowers, 6. Daniel E Leakins. All of whom reside in  
Frederick County, Maryland That John Leakins, a brother of said  
intestate, died before said intestate leaving the following descendants  
1. James Leakins and Catharine his wife, 2. Elizabeth now the wife  
of Eli Molesworth 3. Martha now the wife of Charles Phoebus 4.  
Jacob Leakins that said James Leakins and Catharine his wife and  
said Eli Molesworth and Elizabeth his wife reside in Howard County  
State of Maryland and that Charles Phoebus and Martha his wife and  
Jacob Leakins reside in Montgomery County State of Maryland. That  
said Amos Leakins the other Brother of said intestate left the  
State of Maryland more than thirty years ago, and that since his  
departure nothing has been heard of the said Amos Leakins and that  
the presumption of law is that the said Amos Leakins is dead.  
Your Complainants further charge that the Children of the said