

No 4461 Equity

Bill

George J. Eamick & Virginia
Eamick his wife, by her husband
& next friend George J. Eamick

vs
Snyder Bennett Adm^r of Henry
S. Williams dec^d. Mortimer
Waltman et al

To the Honorable the Judges of the Circuit Court for Frederick
County, sitting in Equity.

The Bill of Complaint of George J. Eamick and Virginia Eamick his wife by her next friend and husband George J. Eamick of Loudoun County, in the State of Virginia, respectfully shews, that a certain Mary C. Williams departed this life on or about the 22^d day of October in the year Eighteen hundred and seventy eight, intestate, seized and possessed of a certain real estate situated in the village of Point of Rocks Frederick County, Maryland, which was conveyed to her by Otto W. Trundle, by a deed of conveyance, bearing date October 9th A. D. 1865, and duly recorded in Liber J. W. & C No 3 folio 165 one of the Land Records of Frederick County, and fully described in a certified copy of said deed herewith filed marked Complainants Exhibit No 1, as part of this Bill.

Your Complainants allege and charge that the said Mary C. Williams, deceased, was in her life time, indebted unto R. J. Lawson on a Promissory note bearing date Nov. 17th A. D. 1871 and payable twelve months after date, for Three Hundred and twenty two Dollars and fifty five cents and to secure the payment of the same, did on the date of said note execute a mortgage on the real estate herein mentioned, to the said R. J. Lawson, who on the 9th day of October A. D. 1878 assigned and transferred the said note and mortgage to Hickman and Williams and that the said Hickman and Williams subsequently on the 9th day of November A. D. 1878 assigned and transferred the same to George J. Eamick one of your Complainants: That default has long since been made in the payment of the sum of money secured by said mortgage less the credits endorsed on the back of said note and the same is still due and owing to the said George J. Eamick, all of which is fully set forth in the said note and a certified copy of said mortgage herewith filed marked Complainants Exhibits Nos. 2 & 3 as part of this bill.

Your Complainants further allege and charge that the said Mary C. Williams deceased, was in her lifetime indebted unto Henry S. Williams on her promissory note bearing date January 4th A. D. 1872 for Fourteen Hundred Dollars and to secure the payment of the same did on the date of said note execute a mortgage on the real estate herein mentioned to the said Henry S. Williams, all of which is fully set forth in the said note and certified copies of said mortgage herewith filed marked Complainants Exhibits Nos 4 & 5 as part of this bill That since the execution of the said note and mortgage the said Henry S. Williams departed this life, intestate, and that letters of administration upon his