No. 4478 Equity

Edgar A. Collins pro. ami
vs
Jeannette Collins Charles A. Collins et al

In the Circuit Court for Frederick County
Sitting as a Court of Equity

Bill of Complaint

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

Humbly complaining showeth unto your honors your Orator Edgar A. Collins of Frederick County in the State of Maryland prochein ami of Jeannette Collins and Charles A. Collins infants under the age of twenty one years, respectfully shows that heretofore William S. Thompson and wife conveyed unto a certain Mary A. Collins a tract or parcel of Land lying and being in said County by deed bearing date the sixth day of February eighteen hundred and seventy-four and duly recorded in Liber J G No 1 folio 213 one of the Land Records of Frederick County aforesaid, a certified copy of which deed is herewith filed marked Exhibit A, And is together with all other Exhibits herewith and hereafter filed prayed to be taken and considered as part of this Bill of Complaint as fully as if herein at large in words and figures set forth That to secure the sum of Seven thousand one hundred and thirty dollars and fifty cents part of the purchase money of said farm and tract of Land to said Mary A. Collins on the said sixth day of February Eighteen hundred and seventy four made and executed a Deed of Trust conveying said farm or tract of land or a part thereof unto John J Johnson of Washington City, in the District of Columbia, which conveyance was intended to be in the nature of a Mortgage to secure the said William S. Thompson the said balance of the said purchase money; That thereafter the said Mary A. Collins, conveyed unto George W Snouffer by deed a portion of said land as will appear by reference to Exhibit C. herewith filed Your Orator herewith files a certified copy of said deed of Trust or indenture in the nature of a Mortgage as Exhibit B.

That in the third day of March Eighteen hundred and seventy-seven the said Mary A. Collins by deed of that date duly recorded in Liber J G. No 6 folio 743 one of the Land Records of said County, conveyed the said tract of Land, except so much as had been previously conveyed to the said Snouffer, to Catharine Collins wife of John Collins for the life of the said Catharine and for her sole use and to the children of the said Catharine by her said husband John Collins after the death of the said Catharine Collins, as will appear by reference to a certified copy of said deed herewith filed marked Exhibit D

That the said John Collins and Catharine Collins his said wife are both dead leaving the said Edgar A. Collins, your Orator, and the said Jeannette Collins and Charles A. Collins their heirs at law and only surviving children.

That the said William S. Thompson and the said John J Johnson transferred and assigned the notes secured by said deed of trust to a certain John H Williams of Frederick County aforesaid who now holds two of the said notes each for the sum of two thousand three hundred and seventy six dollars and eighty six cents, one of the three notes secured by said Deed of Trust having been paid to the said John H. Williams heretofore

That the said Edgar A. Collins, and Jeannette Collins and Charles A Collins are entitled to the said farm and tract of Land subject to the said lien thereon under said deed of Trust securing the said sum of four thousand seven hundred fifty three dollars and seventy two cents as evidenced by said two notes now held by the said John H. Williams