

No 4427 Equity

Wm P Maulsby Jr

Bill of
Complaint

Eliza Turner Jane R. Anderson
Thomas W. Anderson & others

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

Annably, complaining shows unto your Honors your Oration William P Maulsby Jr of Frederick County that here to fore to wit on the 9th day of October in the year 1861 a certain Mary J Turner and a certain ^{Anna} Rebecca Turner being indebted unto the Franklin Savings Bank of Frederick in the sum of six hundred and twenty five dollars current money with interest from said date and intending to secure payment of the same unto the said ^{by the first of June of that date Comptroller of the said Franklin Savings Bank of Frederick} Franklin Savings Bank of Frederick in fee simple certain Real Estate lying in said County and particularly described in said deed, which said real estate is now in the possession of a certain Thomas Turner as Tenant, to a Richard Reed there is a condition annexed that the same should be so as for payment by the said Mary J Turner and the Ann Rebecca Turner or either of them to said Franklin Savings Bank of Frederick of said sum of money with interest thereon from said 9th day of October 1861 whenever demanded, as by a copy of said deed filed herewith as Exhibit A with all other Exhibits herewith filed prayed to be taken & considered as parts hereof will fully appears And your Oration further shows that some years since the said Mary J Turner departed this life, and the whole interest and estate became invested in said Ann R. Turner; that said Ann R. Turner on the 29th day of August 1877 executed the note filed herewith as Exhibit B, to a certain William H Sheddman who is Secretary of said Franklin Savings Bank for said Savings Institution for the payment of the sum of money named in said mortgage that said note is now due together with interest thereon from the 19th day of December 1877. That your Oration obtained said mortgage & note from said Franklin Savings Bank of Frederick by assignment in writing of said mortgage & note as fully appears from an inspection of the same and for value - And your Oration further shows that sometime in the month of November in the year 1877 the said Ann R. Turner departed this life, leaving a last will and testament duly executed according to law and admitted to probate in the Orphans Court for Frederick County & now duly recorded in the Office of the Register of Wills of said County that by said last will and Testament, a certain Eliza Turner and a certain Jane R. Anderson who has intermarried with a certain Thomas W Anderson, all of whom are of Frederick County were devised all the interest of said Ann R. Turner in Real estate mentioned in Bell (a) the said Thomas W. Anderson was appointed Executor, that the whole of said mortgage debt & interest on the same from the 19th day of December 1877 remain wholly due and unpaid

To the end therefore that the said Eliza Turner, Jane R Anderson and Thomas W. Anderson her husband and Thomas W. Anderson Executor of the last Will and Testament of said Ann R. Turner and Thomas Turner