

No. 4373 Equity.

of Eight hundred and fifty eight Dollars with interest thereon from date, as appears by reference to said Single Bill herewith exhibited as Exhibit No. 1, which your Complainant prays together with all other Exhibits hereinafter produced, may be taken and considered as part of this his Bill of Complaint - the same as if set forth in words and figures.

Your Complainant further charges that on the twenty third day of December 1870 the said John George Beerlein executed his will in due form of Law to pass Real Estate - in which he devised to his wife Mary P Beerlein all his property for and during her life and no longer, and after her death he devised that all the rest and residue of his estate to Peter Sahn his heir and assigns in fee simple - All of which will appear by reference to a certified copy of said will herewith filed, marked Exhibit No. 2

Your Complainant further charges, that the said John George Beerlein, was in his life time seized, and possessed of a house and lot situate on East Fifth Street, Frederick City, State of Maryland and fully described in the deed from John Lambright and wife a certified copy of which is herewith exhibited, marked Exhibit No. 3.

Your Complainant further charges that the said John George Beerlein died in the month of May in the year 1875, without revoking said Will - and that the same was duly admitted to probate in the Orphans Court for Frederick County - and letters Testamentary issued to Peter Sahn the Executor, named therein, as appears by a certified copy of letters of Exemplification herewith exhibited, marked Exhibit No. 4.

Your Complainant further charges that the personal estate of the said John George Beerlein is wholly insolvent and insufficient for the payment of his debts - and that it will be necessary to sell the Real estate of the said Beerlein for the payment of his debts.

Your Complainant further charges that on the second day of May in the year eighteen hundred and seventy eight the said Peter Sahn and Mary A. B. Sahn his wife, executed their deed of trust to James W. Pearce and Noah Boulus Edge conveying to them in trust for the benefit of the creditors of said Peter Sahn, all the right title and interest of the said Peter Sahn in and to the Real Estate aforesaid, as appears by a certified copy of said deed of trust herewith filed, marked Exhibit No. 5.

To the end therefore that the Defendants hereinafter named, may answer the matters and things herebefore stated - the same as if they were herein again repeated and they were thereunto specially interrogated. And that the real estate of which the said John George Beerlein died seized and possessed, may be sold for the payment of the claim of your Complainant and for the payment of the claims of all other creditors of the said John George Beerlein who may come in and contribute to the expense of this Bill and that your Complainant may have such other and further relief as the nature and equity of this cause may require.

May it please your Honor to grant unto your Complainant the writ of subpoena a - gainst the said Peter Sahn Executor of the last will and testament of John George Beerlein Mary P Beerlein, Peter Sahn and Mary A B Sahn, James W Pearce and Noah Boulus all of Frederick County, commanding them to appear in this Court on some certain day to be named therein to answer the premises, and abide by and perform such decree as may be passed thereon.

Milton G. Orner
Charles W. Ross
Sole for Complainant

Filed May 6, 1878.

\$858.70

Frederick Md. February 1st 1875

Eighteen months after date we jointly and severally promise to pay to

Exhibit No 1

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