No. 4801 Equity

Frederick Heinlein vs. Cyrus Fout & Martha E. Fout his wife Theodore M. Rupley & Fanny Rupley his wife, and others.	To the Honorable, the Judges of the Circuit Court for Frederick County sitting as a Court of Equity.

Bill of Complt.

The Bill of Complaint of Frederick Heinlein of Frederick County State of Maryland, in behalf of himself and of all other creditors of William H. Ramsburg late of said County and State, deceased who may come in and contribute to the expense of these proceedings, respectfully shows to your Honors, that the said William H. Ramsburg was in his lifetime indebted to your Complainant, by his promissory Note, dated on the first day of December Eighteen hundred and eighty four, and payable twelve months after date to your Complainant or order in the sum of Two thousand Dollars with interest from date, as will appear by reference to said promissory note herewith exhibited, and marked Exhibit No. 1, which said Exhibit together with all other Exhibits hereinafter produced upon your Complainant prays 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 states that during the life time of the said William H. Ramsburg the interest was paid on said note up to the first day of December 1879, and that since the death of said William H. Ramsburg, he has received from Catharine A. R. Ramsburg Executor of said William H. Ramsburg the sum of Seven hundred and thirty four dollars and twenty five cents and from Thomas Grosnick Trustee the sum of Nine hundred and twenty one Dollars and Eighty two cents, in part payment of said note, leaving a balance of Six hundred and twenty one dollars and eight cents, with interest from May 15th 1882, still due owing and unpaid on said note.

Your Complainant further states that the said William H. Ramsburg died in the month of June in the year Eighteen hundred and eighty, and by his last Will and Testament duly admitted to probate in the Orphans Court of Frederick County, did devise and bequeath his whole estate Real and personal to his wife Catharine A. R. Ramsburg for and during her natural life, and after her death, did devise and bequeath the same to Thomas Grosnick and Thomas M. Markell in trust for the use and benefit of his daughter Martha now the wife of Cyrus S. Fout and Fannie now the wife of Theodore M. Rupley for and during their lives and after their death to their children, according to the provisions of said Will a certified copy of which is herewith exhibited, marked Exhibit No. 2.

Your Complainant further states that Letters Testamentary on the Estate of said William H. Ramsburg, were granted by the Orphans Court of Frederick County to Catharine A. R. Ramsburg the Executrix named in said Will, who duly entered upon her trust, and settled the personal estate of said William H. Ramsburg, and made a liquidation and distribution of the same among the Creditors of the said William H. Ramsburg, the personal estate of said decedent being wholly inadequate for the payment of his debts.

And your Complainant further charges that at the time of his death the said William H. Ramsburg was largely indebted to various persons by Mortgage and by notes and open accounts, and that his personal estate was wholly insufficient for the payment of his debts that certain Mortgage creditors have made sale of