

No. 4857 Equity

owing to your Complainant about the sum of Forty three dollars with interest from the day of September 1881, as appears by said note and receipts of payments therewith filed marked Exhibits Nos. 1, 2 & 3, which said Exhibits together with all other Exhibits herein after produced may be taken and considered as part of this Bill of Complaint.

Your Complainant further states that the said Moses Boone was in his life time seized and possessed of a House and Lot situate in Kilmichael's Alley, Frederick City, State of Maryland, which he purchased from and was conveyed to him by deed from William H. Houb and Marzetta C. Houb his wife, a certified copy of which is herewith Exhibited with this Bill of Complaint marked Exhibit No. 4.

Your Complainant further charges that the said Moses Boone died intestate in the month of August or September in the year Eighteen hundred and eighty two, seized and possessed of the House and Lot aforesaid and leaving a widow Mary Boone who is entitled to a dower interest in said land, but no child or children or relations except as hereinafter set forth. Your Complainant further states that the said Moses Boone was a Colored man and in Early life a slave, that she has been informed and so charges that when he was very young his father and mother and two young children sister of the whole blood of the said Moses Boone, Harnette and Elizabeth were sold into slavery and taken and removed from the State of Maryland, and from that day to the present nothing has been heard of the parents or sisters of the said Moses Boone, nor is your Complainant aware, whether the said parents of the said Moses Boone had other children or whether the said children the sisters aforesaid or if brothers and sisters of the said Moses Boone and to whom the lands aforesaid would descend as tenants in common, be living or dead, and would be proper parties to this Bill of Complaint. Your Complainant therefore states, that the said sisters of the said Moses Boone - or if there be brother brothers and sisters of the said Moses Boone are proper party defendants to this Bill of Complaint. Your Complainant therefore states, that the personal estate of the said Moses Boone is wholly insolvent, and insufficient for the payment of his debts and that it will be necessary to sell the Real estate in these proceedings mentioned for the payment of his debts. - So the said therefore that the defendants hereinafter named may answer the matters and things herein stated as if they were herein stated as if they were herein again repeated and they were thereunto specially interrogated and that the real estate in these proceedings mentioned may be sold for the payment of the Claim of your Complainant and of all other creditors of the said Moses Boone who may answer and contribute to the expenses of this suit and that your Complainant may have such other and further relief of the nature and quality of his Case may require. - May it please your Honor to grant unto your Complainant an Order of Publication against the sister of the said Moses Boone, whose name is unknown to your Complainant and also against any other brother or sisters of the said Moses Boone if any whose name or names are unknown to your Complainant - and whose residence is unknown, but they are not residents of the State of Maryland of the substance and object of this suit, and warn them to appear in this Court in person or by solicitor on some day to be fixed in said order to answer to said Bill of Complaint and show cause if any she or they have, why a decree should not pass as prayed, and also the writ of subpoena against Mary Boone, widow of Moses Boone of Frederick County State of Maryland, commanding her to appear in this Court on some certain day to be therein named to answer the Bill of Complaint and abide by and perform such decree as may be passed therein, and as in duty lies.

Filed Jan 5. 1883.

J. Ross
Chas W. Ross Sol. for Complainant