

No. 4484 Equity

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

The Bill of Complaint of C. Keifer Thomas and Evencia Thomas his wife respectfully shows to your Honors—

That a certain Samuel S. Thomas late of Frederick County in the State of Maryland departed this life some time about the year 1839 leaving a last will and testament which was duly admitted to probate & is recorded in Liber G. M. E. N^o 1. folio 210 & 5 one of the Records of Wills in the office of the Register of Wills for Frederick County a certified copy of which is filed herewith as Exhibit A, which together with all other exhibits herewith filed is prayed to be taken and considered as part hereof, that at the time of his death said Samuel S. Thomas was seized and possessed of a large & valuable tract of land lying in Frederick County which is fully described in the plat for the same herewith filed marked Exhibit B That by said Will said Samuel S. Thomas devised the lands mentioned in Exhibit B to his daughters Eliza Phoebe and Mary for and during their lives and after the death of the longest liver of said three daughters to a certain Samuel Thomas and his heirs: That said Samuel Thomas last mentioned died intestate as to his real estate in the year 1844 leaving as his heirs at law the complainant Christian Keifer Thomas Bruce Thomas, William Nolley Thomas, Anna Thomas who is intermarried with a certain James S. Simmons, and Adelaïd or Adeline Thomas who married Edward H. Stone and has since died leaving the following children to wit; Albert Stone who is an adult and Cecelia Stone who is an infant above 15 but under 21 years of age and Samuel Thomas Stone who is an infant under 21 years of age leaving Edward H. Stone her husband surviving & that all of said persons are residents of Frederick County except said Samuel Thomas Stone— And the Complainants further show that all three of said daughters of said Samuel S. Thomas are dead: that said Phoebe S. Thomas during her lifetime became the purchaser of all the right title claim & interest of any and every kind which the said Bruce Thomas and William Nolley Thomas possessed in the land mentioned in Exhibit B under and by virtue of the provisions of the last Will and Testament of Samuel S. Thomas filed herewith as Exhibit A as will appear by Exhibits C & D filed herewith. That said Phoebe S. Thomas died some time in the year 1878 leaving a last will and testament which was duly admitted to probate in the Orphan's Court for Frederick County, by which she devised to the complainant C. Keifer Thomas all her right, title claim & interest in and to the "Home Farm" as will appear by a