No 5255 Equity.

David E. Stem vs. Allie May Shivers, Susan Shivers, Administratrix of George Shivers decd	In the Circuit Court for Frederick County, sitting as a Court of Equity

To the Honorable the Judges of said Court — Your Orator complaining says: 1st That he files this Bill as well for himself as for all other Creditors of George Shivers decd who may come in and contribute to the expenses of this Suit.

2nd That George Shivers late of Frederick County died intestate about the 1st day of October in the year 1886 seized and possessed of about 14 Acres of land situated in said County upon which he resided at the time of his death and particularly described in a deed from William Ecker and Wife to said George Shivers a Certified Copy of which is herewith filed marked exhibit No. 1. and which with all other Exhibits herewith filed is prayed to be taken as part of this bill of complaint as fully as here inserted in words and figures.

Bill of Complaint.

3rd That said George Shivers died leaving Susan Shivers as his Widow and Allie May Shivers who is a minor about ten years of age as his only child and heir at law.

4th That said George Shivers was at the time of his death indebted to your Orator in the sum of 37 dollars and interest from the 1st day of January A. D. 1886 for which your Orator holds the Single Bill of said George Shivers for said amount dated the 1st day of January A. D. 1880 and which is filed herewith marked exhibit No. 2.

5th That said George Shivers was largely indebted at the time of his death and his personal estate is insufficient to pay such indebtedness and it will be necessary to sell said Real Estate to pay the Indebtedness of said George Shivers to your Orator and his other Creditors —

6th That Letters of Administration upon the estate of said George Shivers decd have been granted by the Orphans Court of Frederick County to Susan Shivers widow of said deceased as will appear by exemplification thereof filed herewith marked Exhibit No. 3.

7th That said Susan Shivers widow of said George Shivers decd is willing for said Real Estate to be sold free and and clear of her right of dower therein, she to receive in lieu thereof such proportion of the proceeds of sale to which she may be entitled by law and the rules of Your Honorable Court, as will appear by her Consent thereto filed herewith — And Your Orator prays for the following relief:

1st That a decree may be passed by Your Honorable Court appointing some suitable person as Trustee to sell said real Estate for the purpose of paying the indebtedness of said George Shivers decd to your Orator and such other Creditors as may come in and contribute to expenses of this suit.

2nd That process may be issued against said Susan Shivers, administratrix and Allie May Shivers both of whom reside in Frederick County —

3rd That your Orator may have all such other and further relief to which he may be entitled and to your Honors seems just, and he will ever pray etc.

Milton G. Urner, - - - - -
Solcd for Plaintiff —