No 4960 Equity

Elizabeth G. Simmons,

vs

Elizabeth G. Simmons et al, J. Frank Simmons, Fannie S. Simmons, Lee Howard Simmons, Charles P. Simmons, Mrs Anna Mary Jamison, J. Vincent Jamison, John K. Simmons, R. Gordon Simmons, Emma May Simmons, John T. Worthington, William Reich Trustee, Franklin Savings Bank, James Lee Simmons acting Exr. of James P. Simmons, Virginia Neill & William Neill

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

Humbly complaining show unto your Honors your Orator, Elizabeth G. Simmons of Frederick County in the State of Maryland.

1st That your Orator is the widow of Charles P. Simmons late of Frederick County deceased who died about the 6 day of December 1883 at said County intestate.

2 - That said Charles P. Simmons left surviving him his children and heirs at law, as follows: Fannie S. Simmons, J. Frank Simmons, Lee Howard Simmons, of Frederick County, Charles P. Simmons of Baltimore City and Mrs Anna Mary Jamison who is intermarried with a Certain J. Vincent Jamison and who resides with her said husband in the State of Virginia -

3 - That the said Charles P. Simmons was at the date of his death seized of a large and valuable real Estate Viz. a farm of about 175¼ acres which is fully described in the deed for the same filed herewith as Exhibit No. 1 which with all other Exhibits herewith filed or to be filed is prayed to be considered as part hereof, and also of a valuable Mill property known as Monocacy Mills as will appear by a Certified Copy of the deed for the same filed herewith as Exhibit No 2. as also of a valuable wood lot of about 60 acres a Certified Copy of the deed for which is filed herewith as Exhibit No 3 - all of which Real Estate lies in Frederick County in the State of Maryland -

4 - That at the time of his death the said Charles P. Simmons was very largely indebted among others to your Orator in a promissory Note for the sum of Five Thousand Six Hundred Dollars with interest from the — Day of June in the Year 1883 as appears from said promissory Note filed herewith as Exhibit No 4 and which said Note is not yet due -

5 - That the said Charles P. Simmons was also indebted at time of his death to a Certain William Reich Trustee in the sum of Five hundred Dollars secured by Mortgage upon the property mentioned in Exhibit No 1 which said debt is now due and payable as will appear from a Copy of the same filed herewith as Exhibit No 5 -

6 - That said Intestate was also at his death indebted to the Franklin Savings Bank a body Corporate under the laws of Maryland in the sum of $3500 long since over due and secured by Mortgage upon the property mentioned in Exhibit No 1 as appears by a certified Copy of said Mortgage filed herewith as Exhibit No 6 -

7. That said Intestate was also indebted unto a Certain James Lee Simmons acting executor of James P. Simmons in the sum of $1062 with interest from the 23rd Day of September 1882 and $7.85 Cts. the same being a judgment obtained in the Circuit Court for Frederick County, as appears by a short Copy of the same filed herewith as Exhibit No 7 -