No. 4960 Equity.

amount mentioned in Exhibit No 6, but that she is willing that said Real Estate be sold clear of her Claims to the same.. all of her rights to any interest in said real Estate as the widow of said Charles S. Simmons being entitled to the funds arising from the sale of the Real Estate herein mentioned in lieu of the land itself.

16- And your Orator further shows that since the Execution of Exhibit No 9 the said R. Emory Simmons has departed this life leaving as his children and heirs at law. James S. Simmons. Susan Simmons and Virginia Neill who is the wife of William Neill and all of whom are non-residents of the State of Maryland.

16- And your Orator further charges that she files this Bill in behalf of herself and all other Creditors of the said Intestate who may become parties hereto and bear a proportionate part of the Expenses thereof.

17 That she is advised and so charges that she is entitled to have said Real Estate herein mentioned sold for the payment of the debts owe by the said Charles S. Simmons and that the said John T. Worthington is a resident of Frederick County.

18- In Tender Consideration whereof and for as much as the said Orator is remediless in the premises except by the aid of your Honorable Court and to the end that the land and premises herein mentioned may be sold free and clear of the liens and Encumbrances on the same as herein set forth and that the funds arising from said sale may be distributed among the parties entitled in the order of their respective priorities and according to the several liens upon the same and that your Orator and all other Creditors may be paid all just and proper Claims against said Charles S. Simmons and that your Orator may have all such other and further relief in the premises as her case may require May it please your Honors to grant unto your Orator the writ of subpoena of your Honorable Court directed to the Sheriff of Frederick County commanding him to summon the said Fannie T. Simmons, T. Frank Simmons, Lee Howard Simmons, John T. Worthington, James Lee Simmons acting Executor of James Simmons Richard Gordon Simmons, Lama May Simmons and Elizabeth G. Simmons Administratrix of Charles S. Simmons all of Frederick County. also the writ of subpoena of your Honorable Court directed to the Sheriff of Baltimore City commanding him to summon the said Charles S. Simmons of Baltimore City as also the writ of subpoena of your Honorable Court commanding the Sheriff of Frederick County to summon William Reich Trustee and the Franklin Savings Bank of Frederick Commanding them & each of them to be and appear in your Honorable Court upon some day in said subpoena to be named to answer the premises and show cause if any they have why a Decree should not pass as prayed. and also an order of publication giving Notice to the said John T. Simmons. Anna Mary Jamison and I Vincent Jamison her husband, James S. Simmons Susan Simmons, and Virginia Neill & William Neill her husband all of whome are non-residents of Maryland of the substance and object of this Bill and warning them and each of them to appear in this Court in person or by attorney on or before a Certain Day to answer the premises and to show cause if any they have why a Decree should not pass as prayed.

And as in duty bound &c &c.

Wm. P. Maulsby Jr. Sol. for Complainant.