

No. 6087 Equity

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Unnie K. Adams and Edward C. Adams her husband; Byron S. Etchison and Mary S. Etchison his wife; Helen M. Apples and Arthur M. Apples her husband; Annie M. Cobb and Edward S. Cobb her husband and Grace G. Etchison

In the Circuit Court for Frederick County sitting as a Court of Equity.

Alicia V. Etchison, Howard M. Etchison Elizabeth Etchison, Margaret Etchison and Joseph Wood,

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

The Bill of Complaint of Unnie K. Adams, and Edward C. Adams, her husband, Byron S. Etchison and Mary S. Etchison his wife, Helen M. Apples and Arthur M. Apples her husband, Annie M. Cobb and Edward S. Cobb her husband and Grace G. Etchison respectfully represents unto your Honor 1<sup>st</sup> That the plaintiffs Unnie K. Adams, and Edward C. Adams her husband, Byron S. Etchison and a Mary S. Etchison, his wife, and Grace G. Etchison resides in Frederick County, Maryland, Helen M. Apples and Arthur M. Apples her husband, reside in Washington D.C. Annie M. Cobb and Edward S. Cobb her husband reside in Camden, in the State of New Jersey, and the defendants Alicia V. Etchison Howard M. Etchison, Elizabeth Etchison and Margaret Etchison reside in Washington, D.C. and Joseph Wood resides in Frederick County Maryland.

2<sup>nd</sup> That in the year 1843 one William Wertenbaker of Frederick County Maryland departed this life leaving a last will and testament a certified copy of which as probated in the Orphans Court of Frederick County and filed and recorded in the Office of Register of Wills for Frederick County, herewith filed and marked Exhibit No 1. to this Bill, which Exhibit together with such other Exhibits as the plaintiffs may hereafter file in prayer may be taken and considered as a part of this Bill.

3<sup>rd</sup> That by the provisions of said will and as will appear from said will, the said William Wertenbaker gave to his daughter Mary Elizabeth Etchison, wife of Thomas Etchison and at her death to her child or children, a brick house and lot situated in the town of New Market, which house and lot the said William Wertenbaker died seized and possessed of, all of which appear by reference to Exhibit No 1.

4<sup>th</sup> That on the death of said William Wertenbaker, in pursuance of the provisions of said will, the said Mary Elizabeth Etchison became possessed of said above mentioned house and lot, and in the year 1853, she died still possessed of the same.

5<sup>th</sup> That the said Mary Elizabeth Etchison died intestate leaving her husband Thomas Etchison surviving her, and the following named children: a son named Thomas M. Etchison, a daughter Annie M. Cobb whose husband's name is Edward S.