Bill of complaint

Exhibit "A"

Exhibit "C"

No. 7092 Equity.

Ella V. Smith, Guardian of Clara May Smith, Infant,
vs.
Clara May Smith, Infant.

No. 7092 Equity
in the Circuit Court for Frederick County,
Sitting as a Court of Equity.

To the Honorable, the Judges of said Court:-

Your Oratrix, Ella V. Smith, of Frederick County, in the State of Maryland, Guardian of Clara May Smith, infant, complaining, says:-

First: That she was appointed Guardian to the said Clara May Smith, infant, complaining says:-

First: That she was appointed Guardian to the said Clara M. Smith, infant, by an order of the orphans Court of Frederick County, passed on the 8th day of January A. D. 1897, and has filed her approved bond as such Guardian as will appear by Certificate of Charles E. Saylor, Register of Wills of Frederick County, filed herewith as "Exhibit A," which together with all other Exhibits herewith filed, it is prayed may be taken and considered as a part of this Bill.

Second: That the said Clara May Smith, infant, is seized in fee simple of a lot of ground with improvements thereon; situated on the North side of West Fourth Street, in Frederick City, Maryland, being designated as parts of lots Nos. 214 and 215 on the original plat of said Frederick City, subject however to a Mortgage of One hundred and fifty dollars held by Emory L. Coblentz, which Lot of Ground, subject to the Mortgage aforesaid, was conveyed unto the said Clara May Smith by deed executed by your Oratrix, which deed is filed herewith, marked "Exhibit B."

Third:- That your Oratrix, who is the mother and only surviving parent of the said Clara May Smith is unable to maintain and support her, and that it would be for the benefit and advantage of said infant, that her interest in the said Lot of ground be sold under a decree of your Honorable Court, and so much of the proceeds thereof, after the payment of the expenses of these proceedings as may be necessary be applied to the support and maintenance of said infant, and the residue invested in some productive fund for her benefit:

To the end therefore,

(1) That the interest of said infant in said Lot of ground may be sold under a decree of your Honorable Court, so much of the proceeds thereof as may be necessary be applied to her support and maintenance and the residue be invested in some productive fund for her benefit.

(2) That your Oratrix may have such other and further relief as the nature of her case may require.

May it please your Honors to grant unto your Oratrix the writ of Subpoena in the usual form, directed to the said Clara May Smith, infant, residing in Frederick City, Maryland commanding her to be and appear in this Court at some certain day to be named therein, to answer the premises and abide by and perform such decree as may be passed therein.

And as in duty &c.

Emory L. Coblentz
Solicitor for Plaintiff.