

No. 7164 Equity.

Bill of Complaint

The Bill of Complaint of the Security Title and Trust Company of York, Pennsylvania a body corporate, incorporated under the laws of the State of Pennsylvania, Guardian Hostetter, Hilda Hostetter, Fannie Hostetter, Roscoe Hostetter, Elgae Hostetter and Samuel A. Youngland, infants, residing in York County, in the State of Pennsylvania, respectfully represent unto your Honors:-

First:- That your complainant was appointed Guardian of said Infants by orders passed on the 7th day of March A. D. 1894, by the Orphans Court of York County, in the State of Pennsylvania, and has duly qualified as such Guardian as will appear by reference to a certified copy of said orders, filed herewith as "Exhibit A." and "Exhibit A-1," which together with all other exhibits herewith filed it is prayed may be taken and considered as a part of this Bill of Complaint.

Second:-

That Abraham Hostetter, late of Adams County, in State of Pennsylvania, deceased, was in his life-time, and at the time of his death, seized and possessed of valuable real estate situated in Frederick County, in the State of Maryland, consisting of a valuable farm containing Two hundred and One Acres and Eleven square perches of land, more or less, located in Woodborough Election District, in said County and State, and which was conveyed unto the said Abraham Hostetter by deed executed by Abraham Myers and wife, dated April 1st 1864, and duly recorded in the Land Records of Frederick County, a certified copy of which deed is filed herewith marked "Exhibit B."

Third:- That said Abraham Hostetter being seized as aforesaid, departed this life, in the County of Adams aforesaid, intestate, on or about the year 1868, leaving surviving him, a widow, Mary Hostetter, (now also deceased), and the following children as his heirs at law, to whom the said real estate descended by inheritance upon the death of their father, the said Abraham Hostetter, to wit: Samuel Hostetter, a son, whose wife's name is Fannie E. Hostetter; Lizzie Hostetter a daughter who intermarried with M. A. Youngling; Barbara F. Hostetter, a daughter, who intermarried with Samuel S. Nitner; Emma J. Hostetter, a daughter, who intermarried with Henry B. Boer; Anne Hostetter, a daughter, who intermarried with David W. Ferry; Jacob H. Hostetter a son, whose wife's name is Eva Hostetter; Emanuel A. Hostetter, a son, whose wife's name is Fannie V. Hostetter; Aaron Hostetter, a son, whose wife's name is Martha H. Hostetter, all of whom are or were adults, residing in the said York County, in the State of Pennsylvania,

Fourth:-

That since the death of the said Abraham Hostetter, his son, the said Samuel Hostetter has departed this life, leaving surviving him, a widow, the said Fannie E. Hostetter, and the following children, viz, Blanche Hostetter, Hilda Hostetter, Fannie Hostetter, Roscoe Hostetter, and Elgae Hostetter, all of whom are infants and who are defendants in this case.

Fifth:- That since the death of the said Abraham Hostetter, his daughter, the said Lizzie Hostetter, intermarried with M. A. Youngling departed this life, leaving as her surviving husband, the said M. A. Youngling, and one son, the said Samuel A. Youngling, who is and infant, as her only heir at law, and who is also a defendant in this cause.

Sixth:- That since the death of the said Abraham Hostetter, his daughter, the said Anne Hostetter intermarried with David W. Ferry has

accident
of the
res-
aid day.

autobury
had in
ry of

auty
the
having
Other

ig as a