No. 7128 Equity.

Bill of Complaint

Baltimore, State of Maryland that the Defendants, Francis Ladow and Robert Ladow, her husband, reside in the city of Washington, District; that the Defendant, William Key Your Petitioners are now informed, is in the Island of Cuba, that the Defendants John Baltzell was last residing in the city of Baltimore. So your petitioners are informed, but they do not know definitely where he resides; that the defendant corporation the Frederick Town Savings Institution, is a body corporate, incorporated under the laws of Maryland, and doing a general Banking Business in said Frederick City, Maryland.

2. That Dr. William H. Baltzell, being of said Frederick County, died intestate at said County, on or about the 19th day of September A.D. 1899. seized and possessed at the time of his death of a tract or parcel of land together with the improvements thereon situate, lying and being in Frederick City, Maryland, and which is fully described in a deed from Eliza M. Nicholas, dated May 15th A.D. 1893, and duly recorded among the land Records of Frederick County, Maryland, in Liber J.L.J. No. 5 folio 76, conveying said real estate to William H. Baltzell in fee simpee with the reservation to the said Eliza M. Nicholas during her life of whatever rents and profits might arise from said property, a duly certified copy of which deed is herewith filed and marked "Exhibit No. 1" to this Bill which together with such other exhibits as the Plaintiffs may hereafter file, is prayed may be taken and considered as part of this Bill.

3. That the said Eliza M. Nicholas the grantor in the deed just mentioned in the above second paragraph, departed this life some time in the year A.D. 1896.

4. That the said William H. Baltzell left surviving him, a widow, the said Josephine V. Baltzell, and the following children, who are his heirs at law; John Baltzell, a son; Josephine Key, whose husbands name is William Key; Francis Ladow, whose husbands name is Robert Ladow; and Rose Jamison, whose husband's name is Jamison, all adults.

5. That Letters of Administration upon the personal estate of William H. Baltzell deceased, were granted by the Orphan's Court for Frederick County, to the said Josephine V. Baltzell, as will appear by an exemplification of such letters filed herewith marked "Exhibit No. 2" and that said Administratrix qualified as such said letters having been granted on November 27th A.D. 1899, but no inventory of personal property has ever been filed in said Orphan's Court, Nor has she proceeded any further with the administration of said estate.

That said application for letters of Administration stated in her application that said William H. Baltzell left a personal estate amounting to Two hundred and Fifty dollars ($250.00) and by an examination of the claimant Docket in said Court up to the time of the filing of this Bill, creditors claims having been filed amounting to Four Hundred and Forty seven dollars and Fifteen cents ($447.15), not including the claims of your petitioners which are filed filed in this proceeding.

6. That your petitioners are informed and so charge that the personal Estate of the said William H. Baltzell, deceased was and is largely insufficent to discharge all the debts due and owing by him at the time of his death, and your petitioners are advised that the said personal Estate in the hands of said Aministratrix ought to be applied to the payment of the claim of your petitioners and to the creditors of the said William H. Baltzell, so far as the same may extend,