Bill of Complaint

No. 7138 Equity.

James E. Clark and Annie Clark, his wife (nee) John Clark and Emma Clark, his wife; Ida Cromwell and Robert Cromwell, her husband; Catharine Anderson and Albert Anderson, her husband, Sarah McKisick and Lewis T. McKisick, her husband; Charles A. Clark; Mary H. Curry and James M. Curry, her husband, David Clark, Howard Clark and Nelson Clark

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

To the Honorable, the Judges of the said Court:

Your orators, complaining, say:

1. That, heretofore, to wit: in the year 1892, a certain John Clark died in Adams County, in the State of Pennsylvania, seized and possessed of a certain tract or parcel of Real Estate, situated in Frederick County, in the State of Maryland, particularly described in a deed of conveyance from Perry Eyler, administrator of George Eyler, deceased, to the said John Clark, bearing date the 16th day of October, 1878, duly recorded in Liber T. G. No. 10 Folio 373, one of the Land Records of Frederick County, a certified copy of which is herewith filed as part hereof, marked Exhibit A to this Bill of Complaint.

2. That the said John Clark, by his last Will and testament executed to convey real estate, bearing date the 26th day of December 1878, duly approbated admitted to probate in the Orphans Court of Adams County in the State of Pennsylvania, and a duly certified copy of which is recorded in Liber J. K. H. No. 1 Folio 7, one of the Will Records of the Office of the Register of Wills of Frederick County, and a duly certified copy of the said will is herewith filed as part hereof, marked Exhibit B. to this Bill of complaint, gives, devises and bequeaths the said real Estate, described in said Exhibit A. above mentioned, to his son James Miller Clark, for and during the term of his natural life, and after his death, to the children of the said James Miller Clark in fee simple.

3. That on the 26th day of March, 1899, the said James Miller Clark departed this life, leaving surviving him the following children and legatees, to wit:-

(1) John H. Clark a son whose wife's name is Emma Clark, both adults and reside in Frederick County, State of Maryland,

(2) Ida Cromwell, daughter, whose husbands name is Robert Cromwell both adults and reside in Frederick County, State of Maryland.

(3) Catharine Anderson, a daughter, whose husbands name is Albert Anderson, both adults and reside in Frederick County, State of Maryland.

(4) Sarah McKisick, a daughter, whose husbands name is Lewis T. McKisick both adults and reside in Frederick County, State of Maryland.

(5) Charles Clark, a son, an adult and unmarried and resides in Frederick County, State of Maryland.

(6) Mary H. Curry, a daughter, whose husbands name is James M. Curry both adults and reside in Frederick County, State of Maryland.