

No. 7551 Equity

Bill of Complaint,

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity,

The Bill of Complaint of Mary E. Young of Frederick County, State of Maryland, who sues as well for herself as for all the other creditors of Daniel H. Young, late of Frederick County, deceased, who will come in and contribute to the expense of this suit respectfully shows: -

First.

That the said Daniel H. Young, was in his life time and at the time of his death indebted unto your complainant in the full and just sum of one hundred and forty dollars upon his single bill, dated June 1st A.D. 1895, which said single bill was payable one year after date with interest from date at the rate of five per centum per annum, the whole amount of principal and interest of which is still due and unpaid, which said single bill is filed herewith marked Exhibit No. 1, which together with all other Exhibits herewith filed it is prayed may be taken and accepted as a part of this Bill of Complaint,

Second, That the said Daniel H. Young being so indebted as aforesaid and being indebted unto divers other persons and having Real and Personal Property, departed this life in or about the month of May A.D. 1902, leaving a last will and testament, which has been duly admitted to probate by the orphans Court of Frederick County, a duly certified copy of which said will is filed herewith marked Exhibit No. 2.

Third, That Letters Testamentary on the Estate of the said Daniel H. Young have been granted to Lucretia Young, as will appear by an Exemplification of said Letters Testamentary herewith filed, marked Exhibit No. 3.

Fourth, That among other provision made in the will of said Daniel H. Young, there was provision that the real estate should remain as it was the death of the said Daniel H. Young, during the life time of his widow, Lucretia Young, or until she should remarry except that he gave his wife widow the power to dispose of the real estate should she deem it best,

All of which will fully appear by reference to said Exhibit No. 2,

Fifth A. That Lucretia Young, the widow of the said Daniel H. Young exercising the power given her by the Code of Public General Laws of Maryland, did on the 25th day of September A.D. 1902 renounce the provisions of the will of her husband Daniel H. Young and all bequests thereunder, and elected to take in lieu thereof her dower or legal share in the estate of her said husband as will fully appear by reference to a certified copy of her said renunciation filed herewith as Exhibit No. 4.

Fifth, That your complainant is advised and so charges that the personal estate of the said Daniel H. Young is not sufficient to pay all the just debts due and owing by the said Daniel H. Young at the time of his death, and that the real estate of which the said Daniel H. Young died seized and possessed ought to be sold and applied to the payment of the claim of your complainant and the other creditors of the said Daniel H. Young, deceased, as aforesaid,

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