

No. 7947 Equity

Bill of Complaint

Filed Sept - 15 - 1905

In the Circuit Court
for Frederick County,
Glenn H. Worthington and
Julia A. Worthington his
wife Complainants.

vs

James M. Carey, and Ella
M. Carey, his wife, Mary Ann
Dunn and John W. Dunn,
her husband, Teller Lakin and
Charles E. Lakin, her husband,
John Thomas Carey and Mary
E. Carey, his wife William B.
Carey and Minnie Carey, his wife,
Berdie Long and Ralph E. Long,
her husband, Lula M. Carey (unmarried)
Leta Carey, Lawona Carey, and Michael
Carey III infants, and Bessie Carey
widow of Michael Carey, Jr., decedent,
Also Emma F. Kelger, and Victor Kaplan
and Abraham Kaplan, partners trading
as V Kaplan & Bro., Judgment Creditors.
Defendants

In Equity.

To the Honorable the Judges of said Court.
The Bill of Complaint of Glenn H. Worthington
and Julia A. Worthington, his wife, respectfully shew
unto your Honors: -

1. That by a certain deed of conveyance from
Charles W. Schwitz and wife, there was annexed a
certain lot, piece or parcel of land located in
Frederick County, containing one acre of land, more
or less. The said deed dated December 3, 1887 and
duly recorded among the land records of Frederick
County in Liber D. S. P. No 44 folio 746, &c., a Certified
Copy of said deed being filed herewith as Exhibit
M. C. and prayed to be considered a part hereof.
2. That the granting clause of said deed is in these words,
to wit "unto Michael Carey and Sarah E. Carey, and to the
children of them", without naming the children by name.
3. That at the date of said conveyance the said Sarah
E. Carey was the wife of the said Michael, and that
both of said named grantees have since departed this life
the said Sarah several years ago, and the said Michael