

No. 2951 Equity.

Bill of Complaint.

Filed September 17<sup>th</sup> 1906.

Greenberry R. Sappington  
Trustee.

(vs)  
John R. Mills & Rachel  
B. Mills, his wife, Pauline  
Mills, Aberta Mills & Howard  
Mills.

To the Honorable Madison Wilson Circuit Judge  
for the third Judicial Circuit of the State of Maryland,  
sitting in the Circuit Court for Frederick County, in Equity.

The Bill of Complaint of Greenberry R. Sappington  
humbly shews to your Honor,

That a certain Rachel Baker Peame being  
Seized and possessed of certain real estate, lying and  
being in Frederick County, containing three hundred  
and fourteen and one half acres of land, and more  
particularly described in the paper marked Exhibit  
A herewith filed and herewith filed and hereinafter  
more particularly referred to and certain personal property  
being promissory notes in said Exhibit A described, and  
being about to contract matrimony with a certain J.  
R. Mills, then the wife of Virginia now a resident  
of Frederick County, in the State of Maryland did  
with the said John R. Mills as a party shunts  
make an execute a deed tripartite with your  
Complainant, conveying the said lands, and personal  
property to your Complainant as trustee upon the trusts  
that the said Greenberry R. Sappington his executors ad-  
ministrators and assigns shall hold and manage the  
said property and all every part and parcel thereof  
to and for the sole and separate use benefit and  
disposal of the said Rachel B. Peame, her said Mar-  
riage notwithstanding, and that the same in no manner  
whatsoever shall be subject to the direction control or dis-  
position of him the said John R. Mills her intended  
husband or be liable for his debts, and upon the further  
trust that the said Greenberry R. Sappington her  
executors or administrators shall and will pay transfer,  
or deliver unto the said Rachel B. Peame or unto such  
person or persons and at the time or times and in such  
proportion, manner and form as the said Rachel B.  
Peame may direct by her request, or order made writing  
by one or more credible witnesses to said personal property  
be conveyed as aforesaid, and the interest issue and

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