

NO. 6091. Equity.

Bill of Complaint.

Filed March 18th 1899

Martin L. Foyon and
Jennie Foyon his wife
Plaintiff

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

Martin N. Foyon and
Annie Foyon his wife, Ellis
H. Foyon and Florence
Foyon his wife, Catherine Missouri
Hickie her husband, Mary L. Niese,
Savilla Alice Kelbaugh, and
Frank Kelbaugh her husband,
and Nettie Anderson and
Albert Anderson her husband.

To the Honorable ^{Justice} the Judge of Said
Court, The Bill of Complaint of Martin L. Foyon
and Jennie Foyon her husband of Frederick County, respectfully
states,

- 1 That a certain George W. Foyon late of Frederick County, departed this life intestate during the month of February in the year Eighteen Hundred and ninety-three.
2. That said George W. Foyon left surviving him a widow Sabula Foyon who is an adult residing in Frederick County, and the following children or his heirs at law, namely, a son Martin L. Foyon, the name of whose wife is Jennie Foyon, both adults residing in Frederick County, and Plaintiff in the cause, a son Melvin A. Foyon, both adults, non-residents of the State of Maryland and residing in the State of Illinois, a son Ellis H. Foyon, the name of whose wife is Florence Foyon, both adults, non-residents of the State of Maryland and residing in the State of Illinois, a daughter, Catherine Missouri now the wife of John H. Hickie both adults residing in Frederick County, a daughter Mary L. Niese who is a widow adult and residing in Washington County a daughter, Savilla Alice now the wife of Frank Kelbaugh both adults residing in Frederick County, and a daughter, Nettie now the wife of Albert Anderson, both adults residing in Frederick County.
3. That said George W. Foyon was at the time of his death seized and possessed of certain real Estate situate in Frederick County, described in deeds, Copies of which are herewith filed as parts and of Marked Exhibits Nos. 1, 2 and Three, and had also purchased the property described in a deed a Certified Copy whereof will hereafter be filed as Exhibit no. 4, and had paid part of the purchase money but had not received his deed therefor, the balance of the purchase money, it is expected, and contemplated his administrators