No. 8680. Equity.

Bill of Complaint.

Filed March 3-1911

Anna A. Frager, Celia J. Simpson and John H. Simpson her Husband Plaintiffs.

vs

Harry Wood; Cleveland F. Waltz and Sarah Frager Waltz, Thomas Waltz and Anna Waltz, infants Defendants

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

To the Honorable the Judges of the Circuit Court for Frederick County, Maryland Sitting as a Court of Equity:-

Your Orators Complaining Say:-

I.

That they are residents of Frederick county in the State of Maryland.

2

That your Oratrix Ann A. Frager is the widow of Mortimer F. Frager, who died intestate, residents of Frederick County, Maryland, on the date August 28th., in the year 1893.

3.

That at the time of his death the said Mortimer F. Frager left surviving him your Oratrix Anna A. Frager a daughter Essie Frager, a daughter Celia J. Frager, and a daughter Sarah E. Frager.

4

That the said Essie Frager married the defendant Harry Wood and died intestate on the date June 24th., in the year 1910, leaving surviving her said husband Harry Wood an an infant daughter Amelia Frances who survived her Mother only about one month

5.

That the said Celia J. Frager married John H Simpson, and is one of the parties Plaintiff in this Bill of Complaint.

6th

That the said Sarah E. Frager married Cleveland F. Waltz and died intestate on march 19th - in the year 1910. leaving surviving her husband Cleveland F. Waltz and three infant children, who are named Sarah Frager Waltz, Thomas Waltz and Anna Waltz.

7th

That at the time of his death the said Mortimer F. Frager was seized and possessed of a certain parcel of real estate, being a part of a tract of land called "New Market Plains,"