

No. 8944, Equity.

Amended Bill of Complaint.

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

The Bill of Complaint of C. H. Foster trading as C. H. Foster and Fran. of Frederick County, Maryland, on behalf of himself as well as all other Creditors of Moses Brooke who may come in and contribute to the Costs and expenses of this proceedings respectfully shew unto your Honor:—

First, that Moses Brooke was in his lifetime and at the time of his death seized and possessed of a Certain piece or parcel of land, situated in the County of Frederick State of Maryland, which was conveyed unto him by deed, from Samuel Blaggett and wife, dated January 17, 1870, and recorded in Liber C. M. No. 4, folio 479, one of the Land Records of Frederick County, as well more fully appear by reference to a Certified copy of said deed filed herewith, it is prayed may be taken and considered as a part of this Bill of Complaint.

Second, that said Moses Brooke was at the time of his death indebted unto your Complainant, the said C. H. Foster, trading as C. H. Foster & Co., in the sum of Forty-four Dollars, and ninety Cents, (\$44.90), for services rendered and for matters and things properly chargeable on account, evidenced by his duly proven account which is filed herewith as part hereof and marked "Exhibit B".

Third, that the said Moses Brooke, being indebted as aforesaid departed this life, on or about the 18th day of September, A. D. 1913, leaving surviving him the following heirs at law to wit:— Mary Ellen Brooke, a sister, who is now an inmate of Montrose, Frederick County, Maryland; James Brooke, a brother, whose whereabouts are unknown; Lida Snowden, a sister, who is a widow and lives in Rochester, State of New York; and the following children of Charles Brooke, a brother, who died intestate prior to the death of the said Moses Brooke, to wit:— James Brooke, a son, whose wife's name is Ida Brooke, all of whom reside in New York, State of Pennsylvania; Milton Brooke, a son, whose whereabouts are unknown; William Brooke, a son, whose wife's name is Ophelia Brooke, who reside in Lancaster, State of Pennsylvania; Ellen Campbell, a daughter who intermarried with Campbell, and who reside in Everett, State of Massachusetts; Emma Easton, a daughter, who intermarried with Easton and who reside in Boston.