Twenty-six Hundred Dollars, all of which will fully appear by reference to a certified copy of said deed herewith filed marked Exhibit E.

6. That on the 22day of February 1911, the said Flora May Day and husband, reconveyed the property described in Exhibit A to Anna Mary Thomas, the consideration named in said deed being Five Dollars, and said deed being filed and recorded among the land records for Frederick County, as of the date February 24th 1911, or about one month after the said anna Mary Thomas had been advised of the illegal conveyances heretofore made against the rights of Your Complainants, certified copy of said deed being filed herewtih marked exhibit F.

7. That your complainants aver and charge that the property mentioned in the aforegoing exhibits has been conveyed without consideration and in fraud of the rights of your complainants, although said exhibits so mention and set forth considerations of money in each instance, yet in truth and in fact no consideration was ever paid, save and except that mentioned in Exhibit A.

8. That Adelaide S. Thomas, one of the grantees named in the Deed Exhibit, A, depaeted this life on ar abott the 15th day of Maroh 1895, leaving surviving her the complainants mentioned in the aforegoing bill of Complaint, and a husband J. fenton Thomas, who is still living.

9. That while the said Anna Mary Thomas and her children mentioned, and being, at the time of the conveyance, or attempted conveyance by them, to said Robert E. L. Kanode, as set forth in Exhibit B., contained the signature of Adelaide S. Thomas, the mother of your complainants, yet said conveyance was in fraud of the rights of your complainants, and against the explicit and plain terms as set forth in Exhibit A, even if there was a proper consideration passing for the same, which your complainants aver and charge that there was not, and it is particularlu in fraud of the rights of J. fenton Thomas, Jr., one of the complainants in this cause, who was not born at the time of the execution of said Exhibit A.

10. That the property mentioned in Exhibit A by virtue of the conveyance made and herein set forth now stands as the property, in fee of Anna Mary Thomas, (widow of Dr. Jacob D. Thomas) while in truth and in fact the said Anna MAry Thomas has only such interest in said property as is contemplated by the terms of the deed, Exhibit A and th only interest that the said Anna Mary Thomas could, under the terms of said deed, Exhibit A convey, was her estate for life, although, by the said fraud ulent conveyance tge same had been reconveyed to her in fee by said Robert E. L. Kanode Exhibit D and subsequently again by Flora May Day Exhibit F, when it should have been reconveyed to the original parties named in exhibit A, or their heirs as contemplated by the terms of the said exhibit A.

11. That the said Anna Mary Thomas is aged and infirm, and incapable of the management of the farm mentioned in Exhibit A, that said farm is subject to management by tenants alone; that much valuable timber has been out and is being sut, sold and removed from said farm, to its great detriment; that the fencing is in bad condition and the buildings thereon need repairs, and therefore it would be to the interest, benefit and advantage of all the parties to this cause, that the same be sold and the money placed on interest, as the land values are now as high as they could reasonably be expected to go, and that it would bring a fair price if sold.

Your complainant therefore prays--

(a) That the deed, exhibit B, and all deeds subsequent thereto, may be set aside and declared null and void, and by decree of Your Honorable Court, be stricken down.

(b) That the property mentioned in Exhibit A may be decreed tobe sold by a trustee appointed by Your Honorable Court and the funds arising therefrom, be distributed according to the respective rights and interests of the parties.

May it please Your Honors to grant unto your complainant the writ of subpoena directed against the said Anna Mary Thomas, Mary Catherine Thomas, Margaret Ellen PAdgett and John C. Padgett, her husband; Flora May Day and Richard R. Day her husband; J. Fenton Thomas, Jr., and Catherine Grace Thomas, infants and J. Fenton Thomas, surviving husband of Adelaide S. Thomas, commanding them and each of them to be and appear in Your Honorable Court, some day certain to be named therein, to answer the premises and abide by and perform such decree as may be passed therein.

And as in duty &c.

Chas. C. waters,
Solicitor for Complainants.