1st. That Harruet Ann Holt was in her lifetime and at the time of her death seized and possessed of certain pieces or parcels of land situated in the County of Frederick, State of Maryland, which was conveyed unto her by three deeds; first, by deed executed by Joseph Felton and wife, bearing date August 10, 1859, and recorded in Liber B.G.F.No.4, folio 428; second by deed from Daniel Leatherma Trustee, bearing date January 21, 1862, and recorded in liber B.G.F.NO.7, folio 466 third, by deed executed by Daniel Geasey and wife, bearing date April 13, 1858, and recorded in Liber B.G.F.No.1, folio 735, one of the Land Records of Frederick County; as will more fully appear by reference to certified copies of said deeds filed herewith marked Exhibits A_B_and C. which together with all other exhibits herewith filed, it is prayed may be taken abd considered as a part of this bill of complaint.

2nd. That the said Harriet Ann Holt was at the tim eof her death indepted unto your complainant, the said Eutaw D. Neighbors, in the sum of $114.35 for services rendered and matters and things properly chargeable on account, evidenced by his duly proven account which is filed herewith as a part hereof and marked Exhibit D.

3rd. That the said Harriet Ann Holt, being indebted as aforesaid, departed this life on or about the _____day of _____, A.D.1912, leaving surviving her the following children, to wit:--John T. Holt, a son, whose wife's name is Alie Holt; Milton U.S. Holt, a son, whose wife's name is Mollie Holt; Eugene D. Holt, a son whose wife's name is Mollie Holt; Charles Holt, a son, whose wife's name is Lucinda Holt; and Lavina Harne, a daughter, who intermarried with Frank Harne; all of whom are adults and reside in Frederick County, Maryland.

4th. That the said Harriet ANn Holt, being indebted unto a certain Andrew N. Cramer in the sum of Two Hundred and Fifty Dollars ($250.00), in order to secure the same, executed a mortgage conveying the property described in Exhibits A_B and C to the said Andrew N. Cramer for the purpose of securing the payment of said mortgage indebtedness, which said mortgage has been duly assigned to the said C. Alice Cramer, as will appear by a certified copy of said mortgage and assignment filed herewith as apart hereof and marked Exhibit E; and that so far as your Complainant is advised, there is still due and owing on account of said mortgage indebtednesss the sum of One Hundred Dollars ($100.00) with interest.

5th. That the said Harriet Ann Holt, prior to her death, executed a last will and testament constituting and appointing your petitioner, Eutaw D. Neighbors, the Executor thereof, but providing no power of sale whereby said property mantioned in Exhibits A.B & C could be sold under said will, as will more fully appear by reference to a certain copy of said will filed herewith and marked Exhibit F.

6th. That the personal estate of the said Harriet Ann Holt was entirely insufficient to pay the funeral expences and physician's bill incident to the last sickness and death of the said Harriet Ann Holt, and that the real estate mentioned in Exhibits A.B & C should be sold under a decree of your Honorable Court and the proceeds therefrom, after the payment of the mortgage indebtedness there on as represented by Exhibit E, should be applied to the payment of the claims of your Complainant and such other of the creditors of the said Harriet Ann Holt who may come in and contribute to the costs and expenses of this suit.

TO THE END THEREFORE:

(a) That the real estate mentioned in Exhibits A_B &C may be sold and the proceeds, after the payment of the mortgage indebtedness thereon, be applied to the payment of the claim of your Complainant as well as the other creditors of the said Harriet Ann Holt who may come in and contribute to the costs and expenses of this proceeding, and the residue paid under the directions of your Honorable Court.