

BILL OF COMPLAINT

Helen Abell Baughman.
Vs.
Louisa Baughman, Corinee
Baughman deGarmendia, C.
Francis Baughman, E. Austin
Baughman, Carrolll Baughman,
his wife, Helen Baughman
Conley, Charles H. Conley,
her husband, and C. Francis
Baughman, Administrator of
the goods and chattels of J.
William Baughman, deceased.

No. 9363 EQUITY.
In the Circuit Court for
Frederick County,
In Equity.

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity
The Bill of Complaint of Helen Abell Baughman, on behalf of herself and of all other creditors of J.
William Baughman, deceased, who may come in and contribute to the costs and expenses of these proceed-
ings, respectfully shows unto your Honors!:-

- 1st. That J. William Baughman, formerly a resident of Frederick County, State of Maryland, departed
this life intestate on or about the 28th day of July, in the year 1914.
2nd. That the said J. William Baughman died seized and possessed of a tract of land situate and ly-
ing in Frederick County, State of Maryland, containing forty-nine (49) acres and seventeen (17) perches
of land, more or less; it being the real estate conveyed unto him by Mary E. V. Mussetter, et al. by deed
bearing date June 26th, 1896, and recorded in Liber J. L. J. No. 14, Folio 214, one of the land records for
Frederick County; a certified copy of which deed is herewith filed as Exhibit "A" and which, together
with all other exhibits herewith produced, it is prayed may be taken and considered as part of this
Bill of Complaint.
3rd. That the title to the said real estate, upon the death of the said J. William Baughman, intestate
decended to his sister Louisa Baughman, his sister Corinne Baughman deGarmendia, his nephew C. Francis
Baughman, the only child and decendant of his deceased brother Charles H. Baughman, and his nephew and
niece E. Austin Baughman and Helen Baughman Conley, the only children and descendants of his deceased
brother L. Victor Baughman, who are his only heirs at law. That the said Louisa baughman is an adult
unmarried resident of Baltimore County, State of Maryland, of unsound mind, in Mount Hope Retreat; that
the said Corinne Baughman deGarmendia is a widow, and is an adult non-resident of the State of Mary-
land; that the said E. Austin Baughman is now married, and his wife's name is Carroll Baughman; and the
said Helen Baughman Conley is now the wife of Charles H. Conley; and the said C. Francis Baughman is
unmarried; and he the said C. Francis Baughman, E Austin Baughman and Carroll Baughman, his wife, Helen
Baughman Conley and Charles H. Conley, her husband, are all adults residents of Frederick County, State
of Maryland,
4th. That the said J. William Baughman was at the time of his death indebted unto your complainant
in the sum of Twelve Thousand Dollars (\$12,000.), as evidenced by his sealed note payable to your
complainant, bearing date on the 30th day of January, 1908, and payable one year after date; which ibde-
btedness is still due, owing and unpaid; and said sealed note is herewith filed as Exhibit "B."
5th. That letters of administration on the personal estate of the said J. William Baughman were, on
September 2, 1914, granted by the Orphans' Court of Frederick County, into C. Francis Baughman, who duly
qualified as administrator, and entered upon the discharge of his duty as such, as will appear by ref-
erence to the certificate of the Register of Wills for Frederick County herewith filed as Exhibit "C."
6th. That said J. William Baughman did not leave personal estate sufficient to pay his debts and
costs of administration. Wherefore your complainant prays your Honors to pass a decree for the sale
of the real estate hereinbefore mentioned; that some suitable person be appointed trustee to make
said sale; and that the proceeds of sale, after the payment of costs, expenses &c, be applied to the