

No. 10041, Equity

B I L L - O F - C O M P L A I N T

Thomas P, Rice, Lewis B, Kehler,	(No, 10041, Equity,
and Charles S, Brooks,)	In The Circuit Court For Frederick County,
		In Equity,
vs.	(
The Myersville Savings Bank of)	
Myersville, Frederick County,		
Maryland, A Body Corporate,	(
and Mollie Danner,)	

TO THE HONORABLE THE JUDGES OF SAID COURT

Your Orators Complaining say;-

1st,

That a certain Georgianna McDonald, widow, resident of Frederick County, Aforesaid, on or about the 28th day of June, A,D,1918, leaving a last will and Testament, which was filed for record, on the eighth day of July A,D,1918, in the office of the Register of Wills, for Frederick County, as will fully appear unto your Honors by reference to a certified copy of the said last will and testament, which is filed as a part, hereof and Marked "Exhibit A,"

2nd.

That at the time of her death the said Georgiana McDonald, was seized and possessed in in Fee Simple, of a certain lot of Parcel of Ground, situated, lying and being in the City of Frederick, Frederick County, State of Maryland, on the east side of North Bentz Street, between 5 $\frac{1}{2}$ and 6 streets, in said City, it being the same lot or parcel of Ground granted and conveyed by Harry R, Snook, and wife to the said Georgiana McDonald, by deed dated the 30th day of June A,D,1913, and recorded in Liber R.W.B, No,306, folio 28 etc, one of the land records of Frederick County, Maryland, a duly certified Copy of which said Deed is filed herewith, as a part hereof, and Marked Exhibit, B,

3rd,

That at the time of her death, the said Georgianna McDonald, was indebted unto Thomas P, Rice, in the sum of \$56.00, but that the sum of \$12,00 was paid upon said account by Lewis B, Kehler, leaving a balance due and owing of \$44,00 as evidenced by the duly proven account filed herewith, as a part hereof, and Marked Exhibit C, And that at the time of her death, the said Georgianna McDonald, was also indebted unto Charles S, Brooks, M.D. for Medical services, in the sum of \$25,00 evidenced by his duly proven account, which is filed herewith as a part hereof, and Marked Exhibit D, and that the aforesaid Lewis B, Kehler, due to the fact that the real estate, of Georgianna McDonald, deceased, has been devised unto him, the said Lewis B, Kehler, has paid upon said real estate, the County Taxes, and State Taxes, for the Years 1918-1919, and the Corporation Taxes of the City of Frederick for the years 1917, and 1918, and has also Paid \$22,50. in interest on the confessed Judgment, of the Myersville Savings Bank of Myersville Frederick County, Maryland, a body Corporate, against the said Georgianna McDonald, which said Judgment is recorded in the Office of the Clerk's Office of the Circuit Court, for Frederick County, and said Judgment being for the sum of \$250,00 and he the said Lewis B, Kehler, has also paid, to Thomas P, Rice in Part Payment of the funeral expenses of the said Georgianna McDonald, the sum of \$12,00 making a total of \$500, evidenced by his duly proven account, filed herewith, as a part hereof and Marked Exhibit E,

4th,

that your Orators are all residents of Frederick County, Maryland, and that the Myersville Savings Bank, of Myersville, Frederick County, Maryland, is a corporation of the state of Maryland, and that Mollie Danner Adult Defendant, is a resident of Springfield, State of Ohio and that Mollie Danner, adult aforesaid wife of Charles Danner, is a Niece of the said Georgianna McDonald, deceased, and is the heir at law of the said Georgiana McDonald, deceased. and is a legatee, under the will of said Georgiana McDonald,

5th.

That the said Georgiana McDonald, deceased, left no personal property, or estate of any character, out of which your Orators and other Creditors, if any, of the said Georgiana McDonald, deceased, might be paid the amounts due unto the Creditors of the said Georgiana McDonald, deceased,

6th,

That your Orators file this Bill of Complaint, as well for all other Creditors, if any, of the said, Georgiana McDonald, deceased, who may come in and contribute to the expenses of