

No, 10259, Equity,

BILL OF COMPLAINT

in the Circuit Court for Frederick County,

In Equity,

Henrietta r, Davis, and o
 Samuel E, Davis, Individually o
 and as Executors, of the last o
 will and Testament of Alfred W, Davis, o
 deceased, o

vs, o

John J, Davis, and annie E, Davis, his o
 wife, Ida M, Trail, and Ashford Trail o
 her husband, Amelia Brown, and Andrew o
 Brown her husband, Fannie Whipp and o
 Frank whipp, her husband, Elmira K, o
 Talbott and William Talbott, her husband, o
 Rosa B, Davis, Widow, Ida Yingle and o
 Yingle her husband, Bell Davis, Chauncy o
 Hyatt, adults, William H, Davis, Lottie o
 May Davis, and Elsie Hyatt, Infants, o

No, 10259 Equity,

To the Honorable the Judges of said Court,

The Bill of Complaint, of Henrietta R, Davis and Samuel E, Davis, Individually and as executors, of the last will and testament of Alfred W, Davis, late of Frederick county, Maryland, deceased, respectfully represents,

1- That they sue for themselves and all other Creditors, of the said, Alfred W, Davis who may in and contribute, to the Expenses of this suit.

2- That the said Alfred W, Davis, late of Frederick County, deceased, departed this life in the year 1896, testate, having by his said last will and Testament duly probated filed and recorded in the office of the Register of wills, for said Frederick County, devised and bequeathed all of his estate, real and personal, to his widow, the said Henrietta R, Davis for life, or during widowhood, and then to be sold by his executors, and the proceeds divided amongst the Children or their heirs at law, with special provisions for his daughter, during her life, all of which will appear by reference to said Will, a certified copy of which is filed herewith, Marked Exhibit A, and prayed to be taken, as part of this Bill of Complaint,

3- That all of the Daughters, excepting the said Cora L, Davis, married and the said Cora L, Departed this life 16 years ago, intestate, without having Married, and left no Children, or descendants, The said Widow Henrietta R Davis, never remarried, and remains the widow of the said Alfred W, Davis,

4- That said Alfred W, Davis left surviving him his widow, the said Henrietta R, Davis, and the following children to-wit; Samuel E, Davis, William M, A Davis Now deceased, John J, Davis, whose wife's name is Annie Davis, Ida M Trail, whose husbands name is Ashford Trail; Amelia Brown, whose husbands name is Andrew Brown; Fannie Whipp whose husbands name is Frank whipp, Elmira K, Talbott whose husbands name is William Talbott, all adults, residents of said Frederick County, all adults, residents, of said Frederick County, Maryland, And that the said William A, Davis Departed this life, intestate, in 1902, and leaving a widow, Rosie Davis, and the following children, Bell Davis, Margaret Hyatt, who died intestate, in 1913, leaving a husband surviving her Chauncy Hyatt, and One Child, Elsie Hyatt, an infant, Ida Yingle, whose husbands name is _____ Adults and William H, Davis, aged 14 years, and Lottie May Davis, aged, 11 years, all residents of Montgomery County, Maryland, excepting Chauncy and Elsie Hyatt, who are non residents of the state of Maryland, and are residents of the State of New York,

5- That said Alfred W, Davis died seized and possessed of a small amount of personal property, and a farm in Urbana District, in said Frederick County containing 64 acres, and 6 square perches of land, more or less, being part of