

proceeds to be meanwhile deposited in the Frederick County National Bank of Frederick in the name of Fannie B. Evans as Trustee and not to be withdrawn therefrom without the future order of this court.

(Filed May 1st, 1922)

Glenn H. Worthington.

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No. 10135 Equity, BILL OF COMPLAINT

William L. B. Care and  
 Irene W. Care his wife

Vs.

Ida L. Care (Widow of  
 George B. Care, deceased  
 Vernon L. Care, Infant and  
 Viola E. Care his wife.

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No. 10135 Equity  
 In the circuit Court  
 for Frederick County  
 IN EQUITY.

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To the Honorable; The JUDGES of said Court ---

The Bill of Complaint of William L. B. Care and Irene W. Care his wife, both of Brunswick, Frederick County and State of Maryland, respectfully shown unto your Honors-----

1st-- That ascertain George B. Care, late of Frederick County, deceased, departed this life, intestate, on or about April 22nd A. D. 1919 leaving surviving him a widow whose name is Ida L. Care and an adult Son, your Orator, whose wife's name is Irene W. Care and an Infant Son Vernon L. Care, now about 20 years of age, whose wife's name is Viola E. Care, as his heirs at law, and all of whom reside in Brunswick in Frederick County and State of Maryland.

2nd-- That the said George B. Care, at the time of his decease, held title to certain lots or parcels of land in the Town of Brunswick known as lots No's 16 and 17 in block No. 19 on the Plat of the Real Estate Improvement Company's second addition to Brunswick, dated July 24th, A. D. 1890, as will appear by a certified copy of the deed for said lots from Albert S. Brown, trustee in No. 7679 Equity to the said George B. Care of Frederick County in Liber # 318, folio 315, herewith filed and marked Exhibit No. 1 to the Bill of Complaint, which said Exhibit as well as all other Exhibits herewith filed it is prayed may be taken and considered as a part hereof.

3rd.-- That thereafter to-wit on the 11th day of September, A. D. 1916 the said George B. Care and Ida L. Care his wife and your Orator William L. B. Care, executed and delivered to the Real Estate and Improvement Company of Baltimore City a mortgage on the said real estate described and conveyed in Exhibit No. 1 to secure the payment of a loan of \$350.00 that day made to the mortgagors with said real estate as security, a certified copy of said mortgage is filed herewith and is marked Exhibit No 2 to the bill of Complaint.

4th -- That at the time of said purchase to-wit September 6th A. D. 1916, your Orator William L. B. Care, was an infant under the age of twenty-one years and was then, as he is now, employed by the Baltimore and Ohio Rail Road Company. That your Orator desired to purchase a home for himself and not being possessed of sufficient funds of his own to make said purchase of said lots of ground mentioned in Exhibit No. 1 at the price of \$500.00 agreed to be paid therefor or to sign a memorandum of purchase for the same or to execute a mortgage for the purchase money necessary to be borrowed on mortgage to