

BILL OF COMPLAINT

M. Riley Etchison and A. Hart
Etchison, partners trading as
M. R. Etchison and Son; and T.
Clyde Routson,

Vs.

No. 11841 Equity.

Rosa C. Mosberg, widow; Cora A. Taylor and Albert R. Taylor, her husband; Catherine M. Cruit and Luther R. Cruit, her husband; William H. Mosburg and Ada J. Misburg, his wife; Vernon C. Mosberg and Anna S. Mosberg, his wife; Wilson N. Mosberg, unmarried; Nora W. Hawkins and Bernard M. Hawkins, her husband; Mary B. Ogle and Charles D. Ogle, her husband; Valletta S. Thornton and Mortimer Thornton, her husband; Daniel V. Mosberg and Myrtle Mosberg, his wife; Marjorie N. Windle and Samuel S. Windle, her husband; Paul R. Mosberg; unmarried; Jennings C. Mosberg, unmarried; and Francis Mosberg, infant.

In the Circuit Court
for Frederick County,
Maryland, sitting as
a Court of Equity.

To the Honorable, the Judges of the Circuit Court for Frederick County, Maryland, sitting as a Court of Equity;— Your Orators, complaining say;—

FIRST. That a certain Charles H. Mosberg, resident of Frederick County, Maryland, died, aged about 69 years, on or about the date February 22, in the year 1929.

SECOND. That the said Charles H. Mosberg died intestate, leaving surviving him, a widow, Rosa C. Mosberg, and the following named children as his only heirs at law, Cora A. Taylor, married to Albert R. Taylor; Catherine May Cruit, married to Luther R. Cruit; William H. Mosberg, married to Ada J. Mosberg; Vernon C. Mosberg, married to Anna S. Mosberg; Wilson N. Mosberg, unmarried; Nora W. Hawkins, married to Bernard M. Hawkins; Mary B. Ogle, married to Charles D. Ogle; Valletta S. Thornton, married to Mortimer Thornton; Daniel V. Mosberg, married to Myrtle Mosberg; Marjorie N. Windle, married to Samuel S. Windle; Paul R. Mosberg, unmarried; Jennings C. Mosberg, unmarried; and Francis Mosberg, only child and heir at law of Edgar Mosberg, who died intestate in the year 1918, son of the said Charles H. Mosberg and Rosa C. Mosberg.

THIRD. That the said Rosa C. Mosberg, Paul R. Mosberg and Jennings C. Mosberg, are residents of Frederick County, Maryland; that the said Cora A. Taylor and Albert R. Taylor, her husband, William H. Mosberg and Ada J. Mosberg, his wife, Vernon C. Mosberg and Anna S. Mosberg, his wife, Wilson N. Mosberg, Mary B. Ogle and Charles D. Ogle, her husband, Valletta S. Thornton, and Mortimer Thornton, her husband, Marjorie N. Windle and Samuel S. Windle, her husband, and Francis Mosberg, — are all residents of Baltimore City, Maryland; that the said Catherine May Cruit and Luther R. Cruit, her husband, are residents of Montgomery County, Maryland; that the said Nora W. Hawkins and Bernard M. Hawkins, her husband, and Daniel V. Mosberg and Myrtle Mosberg, his wife, are residents of Anne Arundel County, Maryland, and all of said Defendants are sui juris, and over 21 years of age, excepting the said Francis Mosberg, who is an infant about 13 years of age.

FOURTH. That at the time of his death, the said Charles H. Mosberg (or Charles H. Mosberg), was seized and possessed of a certain parcel of real estate, and being a lot of ground containing forty (40) square perches, with a dwelling house and buildings thereon, situated in the Village of Lime Kiln, in Buckeystown District, in Frederick County, Maryland, and being the same real estate as described in the Deed from Albert S. Phleeger and Mary E. Phleeger, his wife, to Charles H. Mosberg, dated July 27th, in the year 1887, and recorded in Liber W. I. P. No. 4, at folio 471, 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 No.",.

FIFTH. That at the same time of his death the said Charles H. Mosberg, was possessed of no other real estate than described in "Exhibit No. 1", and was possessed of no personal property whatever.

SIXTH. That the estate of the said Charles H. Mosberg is indebted unto your Orators, M. R. Etchison and Son, who are funeral directors, in the sum of \$285.00, as evidenced by their account filed herewith as a part hereof marked "Exhibit No. 2"; and is further indebted unto your Orator