

William M. Barker,
Vs.
Moses C. Allbright,
Virginia Wood, infant, and
Patricia Allbright, infant.

"
"
"
"
"
"

In the Circuit Court for
Frederick County, In Equity.
No. 11811 Equity.

-----0-----

TO THE HONORABLE, THE JUDGES OF SAID COURT;

The bill of Complaint of William M. Barker, of Brunswick, in Frederick County, Maryland, respectfully represents;

1. That a certain Donna Maw Allbright, formerly Donna Mae Wood, wife of Jesse Lee Wood, now deceased, departed this life, intestate, on or about August the 22nd, 1928, leaving as her only heirs at law, a surviving husband, Moses C. Allbright, of Washington City, Virginia Wood, an infant daughter aged 9 years, and Patricia Allbright, an infant daughter aged 2 years, both residing in Martinsburg, West Virginia, but now temporarily in Brunswick, Frederick County, Maryland.

2. That said Donna Mae Allbright was, at the time of her death, seized and possessed of all that lot of land in Brunswick Frederick County, Maryland, designated as Lot No. 16, in Block No 16, on the Plat of the Real Estate and Improvement's Company's Second Sub-division of Brunswick, Said lot of land having a frontage of fifty feet on the south side of "A" Street and running back one-hundred and fifty feet to a fifteen foot alley, and being the same lot of land which was conveyed from William P. Deavers and wife, to Jesse Lee Wood, now deceased, and Donna Maw Wood, his wife, now Donna Maw Allbright, by a subsequent marriage.

The said Jesse Lee Wood having departed this life in the year nineteen hundred and eighteen leaving surviving him the said Donna Maw Wood, now Donna Maw Allbright, as the sole owner of said real estate, and your complainant filed herewith as part of this bill of complaint, a certified copy of said deed, and marked "Exhibit A".

3. That at the time of her decease, the said Donna Mae Allbright was justly indebted unto your complainant, William M. Barker, in the sum of five hundred dollars and interest.

4. That said Donna Mae Allbright died without leaving personal estate sufficient to pay her debts and the costs of administration for her estate. The personal estate left by said decedent was of such little value that no administration has been granted on her said estate.

TO THE END THEREFORE,

(1) That the real estate of said Donna Maw Allbright, or so much thereof as may be necessary for the purpose, may be sold by trustees appointed by the Court, for the payment of the claims of your complainant and other creditors.

(2) That your complainant may have such other and further relief as his cause may require.

May it please your Honor to grant unto your complainant the writ of subpoena directed to the said Virginia Wood and Patricia Allbright, infants, now temporarily, in said Frederick County Maryland, and an order of publication against the said Moses C. Allbright, a non-resident of the State of Maryland, commanding them to be and appear in this Court on some certain day to be named therein, to answer the premises and abide by and perform such decree as may be passed thereon.

And as in duty bound etc.

(Filed January 22, 1929)

H. K. DeLauter
Solicitor for Complainant.

EXHIBIT "A"

At the request of Jesse Wood and wife the following Deed is Received for Record and Recorded June 3-1914, at 10.20 O'clock A.M.

Test; Harry W. Bowers, Clerk.

This Deed made this 26th day of May, in the year Nineteen Hundred and Fourteen by William P. Deavers, and Mary J. Beavers, his wife, of Frederick County, State of Maryland, WITNESSETH:-