

## BILL OF COMPLAINT

Thomas E. Watkins, Ira D.  
Watkins and Asa H. Watkins,  
Co-partners, trading as  
The Peoples Lumber and  
Supply Company, Plaintiffs,

Vs.

Charles R. Coleman and  
Dora B. Coleman, Defendants.

No. 11843 Equity.  
In the Circuit Court for  
Frederick County, sitting  
as a Court of Equity.

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To the Honorable, the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity; The Bill of Complaint of Thomas E. Watkins, Ira D. Watkins and Asa H. Watkins, co-partners, trading as The Peoples Lumber and Supply Company, respectfully represents unto your Honors;

1. That your Complainants, Thomas E. Watkins, Ira D. Watkins and Asa H. Watkins, co-partners, trading as The Peoples Lumber and Supply Company, are residents of Mt. Airy, Carroll County, Maryland where they are engaged in the business of selling lumber and other materials for building and construction purposes, and that they have been so engaged for a number of years last past.

2. That the said Charles R. Coleman and Dora B. Coleman, his wife, are both residents of Frederick County, Maryland, and were at the time the below mentioned indebtedness was contracted and said claim created.

3. That on the 2d day of June, 1928, Marion R. Coleman and Helen I. Coleman, his wife, conveyed to Charles R. Coleman and Dora B. Coleman, his wife, for and during the natural life of the said Charles R. Coleman and Dora B. Coleman, and for and during the natural life of the survivor of the said Charles R. Coleman and Dora B. Coleman, his wife, a certain tract or parcel of land, situate, lying and being in New Market District, in Frederick County, Maryland, containing a lot of ground 200 feet more or less, in width, and extending of an even width, from the northern side of the State road leading from Frederick to Baltimore, in a southerly direction, to a depth of 250 feet, more or less, containing 50,000 square feet of land, more or less, a certified copy of which deed is herewith filed as a part of this Bill of Complaint as "Exhibit A", which Exhibit with such others as the Plaintiffs may file herewith, they pray may be considered as a part hereof.

4. That the said Thomas E. Watkins, Ira D. Watkins and Asa H. Watkins, co-partners as The Peoples Lumber and Supply Company, the Plaintiff's at the request of the Defendants furnished certain lumber and materials to the Defendants for the construction of a certain house, bungalow or building, upon the land described in "Exhibit A", and that said lumber and other materials were used in the in the construction of the same, said building being a one-story shingle-roof framehouse, having a front of about 20 feet and a depth of about 28 feet, containing four rooms.

5. That said lumber and other materials were furnished by your Complainants to the Defendants, between the 5th day of April, 1928, and the 28th day of October, 1928, as set forth in their lien claim, and there is still due and owing to the Plaintiffs the whole amount of the price for said lumber and other materials, to-wit:- Seven Hundred and twenty-three and 20/100 Dollars with interest from the 28th day of October, 1928.

6. That within six months after the furnishing of the lumber and other materials to the Defendants by the Plaintiffs, the said Plaintiffs filed their lien claim against said building and the lot of ground on which it is erected and the curtilage adjacent thereto, which lien claim was duly recorded on the 2d day of February, 1929, as No. 321 Mechanics Lien Docket No. 3, Folios 231, etc. one of the Record Books in the office of the Clerk of the Circuit Court for said Frederick County, which said lien claim is herewith filed as a part of this Bill of Complaint and marked "Exhibit M.C".

7. That as above stated, there is still due the Complainants the entire amount and price for the lumber and materials furnished as aforesaid to the Defendants the sum of Seven hundred and twenty-three and 20/100 dollars and interest, as shown by "Exhibit M.C." as above stated,