

CREDITOR'S PETITION

Woodsboro Savings Bank of Frederick County, Maryland, a body corporate	"	No. 13231 Equity
vs.	"	
Paul Bowers, and Catherine Bowers, his wife, Allen Bowers and Miriam Bowers, his wife, Marie Blessing and Frank Blessing, her husband, and Allen S. Bowers, Administrator of Milton D. Bowers.	"	In the Circuit Court for Frederick County.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

THE Woodsboro Savings Bank of Frederick County, Maryland, a body corporate, who sues for itself as well as on behalf of all other creditors who come in and contribute to the expenses of this suit, complaining, says:

FIRST: That a certain Milton D. Bowers departed this life on or about the 23rd day of April, 1935, intestate, being indebted at the time of his death to your Complainant, the Woodsboro Savings Bank of Frederick County, Maryland, a body corporate, in the sum of \$808.43, by his judgment debt bearing date April 26, 1932, a certified copy of which judgment is filed herewith marked Exhibit No. 1, to this Bill of Complaint, which together with all other Exhibits Complaint prays may be taken and considered as a part hereof.

SECOND: That subsequent to the death of the said Milton D. Bowers, Allen S. Bowers, qualified as administrator of his said estate, a certified copy of said Letters of Administration is filed herewith marked as Exhibit No. 2, to this Bill of Complaint.

THIRD: That the personal property of the said Milton D. Bowers amounted to \$189,55 as shown by certified copy of the inventory filed in the Orphan's Court for Frederick County, marked Exhibit No. 3, to this Bill of Complaint, which said personal property is insufficient in value to pay your Complainant's claim heretofore mentioned and represents all of the personal property of the said Milton D. Bowers: wherefor your Complainant avers and charges that it is entitled to have its claim paid out of the real estate of which the said Milton D. Bowers died seized and possessed.

FOURTH: That the said Milton D. Bowers was seized in FEE SIMPLE at the time of his death of all that parcel of land containing fifty acres, more or less, lying and being in Frederick County, Maryland, and described in the Will of Susan Hoy, a certified copy of which is filed herewith marked Exhibit No. 4, to this Bill of Complaint.

FIFTH: That the said Milton D. Bowers left surviving him as his heirs at law and next of kin a son, Paul Bowers, whose wife's name is Catherine Bowers, and who reside near Woodsboro, Frederick County, Maryland; a son, Allen S. Bowers, whose wife's name is Miriam Bowers, and who reside at Woodsboro, Frederick County, Maryland; and a daughter, Marie Blessing, whose husband's name is Frank Blessing, and who reside in Johnsville, Frederick County Maryland. The above described property having vested in the children of the said Milton D. Bowers subject to the debts due and owing at the time of his death.

TO THE END, THEREFORE,

1st. That the real estate of the said Milton D. Bowers or so much thereof as may be necessary be sold for the payment of the claim of your Complainant. and of other unpaid creditors of the decedent.

2nd. That any excess may be properly distributed among those legally entitled thereto.

3rd. That a Trustee may be appointed by Your Honorable Court to make such sale.

4th. And for such other and further relief as the nature of the case may require.

May it please your Honors to grant unto your Complainant the Writ of Subpoena directed to the said Paul Bowers and Catherine Bowers, his wife, of near Woodsboro, Frederick County, Maryland, Allen S. Bowers and Miriam Bowers, his wife, of Woodsboro, Frederick County, Maryland, and Marie Blessing and Frank Blessing, her husband, of Johnsville, Frederick County, Maryland, and Allen S. Bowers, Administrator of Milton D. Bowers, of Woodsboro, Frederick County, Maryland, commanding them to be and appear in your Honorable Court on some day certain to be named