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BILL OF COMPLAINT

George Albert Wilson and John Evan Wilson.	"	No. 13034 Equity.
	"	In the Circuit Court for
vs.	"	Frederick County,
Rachel Wilson Harrison and LeRoy Harrison, her husband, Edwin B. Wilson, Robert E. Wilson and Hallie Wilson, Marie Wilson and Albert Wilson, Infants, children and heirs at law of Olivia R. Wilson and Harry E. Wilson her husband, deceased.	"	In Equity.
	"	
	"	

. . . . .

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of George Albert Wilson and John Evan Wilson, both of Frederick County and State of Maryland, who file this Bill on their own behalf and on behalf of all the creditors of Olivia R. Wilson, deceased, who may come in and be made parties to this proceeding, respectfully shows unto your Honors:

FIRST: That Olivia R. Wilson of Frederick County and State of Maryland, departed this life intestate on or about the month of March, A. D., 1930, leaving surviving her, her husband Harry E. Wilson who also departed this life in the month of October, A. D., 1933, and the following children as her heirs at law, a daughter Rachel Wilson now about 19 years of age, who is married and whose husband's name is LeRoy Harrison, an infant son Edwin B. Wilson now about 17 years of age; and infant son Robert E. Wilson now about 14 years of age; an infant daughter Marie Wilson now about 8 years of age and an infant son Albert Wilson now about 5 years of age. The said children are all residents of Frederick County living near Woodville in said County, except the infant daughter Hallie and Marie who are inmates of the I. O. O. F. Home near Frederick.

SECOND: That the said Olivia R. Wilson was in her lifetime and at the time of her decease, seized and possessed of two tracts or parcels of land situated, lying and being in Frederick County, State of Maryland as follows to wit: First, all that tract or parcel of land containing twenty seven (27) and one quarter (1/4) acres and twelve (12) square perches of land which was conveyed to the said Olivia R. Wilson by Mary E. Bohn and Shirley W. Bohen her husband and others by a deed dated the 25th day of May, A. D., 1925 and duly recorded in Liber No. 354, folio 78 et. seq., one of the Land Records of Frederick County, and, Second, All that other tract or parcel of land containing ten (10) acres of land, more or less, which was conveyed to the said Olivia R. Wilson by Mary E. Bohn and Shirley W. Bohen her husband and others, by a deed dated May 25th, A. D., 1925, and duly recorded in Liber No. 354, folio 77, et. seq., one of the Land Records of Frederick County, the respective deeds for said Land are herewith filed and marked Exhibits No. 1 and No. 2, which it is prayed may each be considered as a part of this Bill of Complaint together with all other Exhibits herewith filed.

THIRD: That the said Olivia R. Wilson and Harry E. Wilson her husband were in their respective lifetime and at the time of the decease of the said Olivia R. Wilson and at the time of the decease of the said Harry E. Wilson, indebted unto your Orator George Albert Wilson in the sum of Seven Hundred Dollars, (\$700.00), upon their joint and several single bill dated September 1st., A. D., 1925 and payable to the said George Albert Wilson or order six months after date, for value received with interest from date, and upon which said single bill there was paid at sundry times One Hundred Forty seven Dollars, (\$147.00) interest, duly credited on the back of said note, which said single bill is herewith filed and marked Exhibit No. 3 to the Bill of Complaint.