

BILL OF COMPLAINT

CREDITOR'S BILL

M. L. Creager and Raymond D. Creager, trading as M. L. Creager and Son	"	No. 13623 Equity
	"	In the Circuit Court
vs	"	for Frederick County
Olive A. Recher and John L. Recher, her husband, Brinton Toms and Grace Toms, his wife, Frank Toms and Ida Toms, his wife, Rene Draper and Clinton Draper her husband, Dora Ridenour, widow Olivia Myers and John Myers, her husband, Howard Toms, unmarried, Wellington Toms and Jettie Toms, his wife, Mildred Begomia and A. Keller Begomia, her husband, Hubert Faulder and Joshua Faulder, Mary Toms, widow and J. Stanley Toms, infant.	"	Maryland, sitting as a Court of Equity.
	"	
	"	
	"	
	"	
	"	
	"	
	"	
	"	
	"	

Your Orator, who sues as well as for himself as for all other Creditors of Martha A. Toms, late of Frederick County, Maryland, deceased, who will come in and contribute to the expense of this suit, complaining says:

FIRST. That Martha A. Toms, late of Frederick County, Maryland died intestate on or about the 17th day of September, 1937 and was seized and possessed of a tract or parcel of land situate about one mile north of Thurmont in Thurmont District Frederick County, Maryland and being the same tract of land described in a deed from Charles Shipley and wife to John H. Toms dated June 10, 1903 and recorded in Liber S. T. H. No. 265 folio 506 one of the land records of Frederick County, Maryland and also being the same tract or parcel of real estate as described in a deed from John H. Toms to Martha A. Toms, his wife by deed dated the 17th day of July, 1910 and duly recorded in Liber 342 folio 203 one of the land records of Frederick County, Maryland, excepting therefrom that tract of land conveyed by deed from John H. Toms and Martha A. Toms, his wife to Latimer T. Schildt dated July 10, 1907 and recorded in Liber S. T. H. No. 280 folio 446 &c one of the land records of Frederick County, Maryland, a Certified Copy of the Deed conveying the said property to the said Martha A. Toms is filed herewith marked Exhibit No. 1 to this Bill of Complaint which is prayed may be taken and considered a part thereof.

SECOND. That the said John H. Toms, husband of the said Martha A. Toms died on or about the 6th day of February, 1923 and upon the death of the said Martha A. Toms, intestate on or about the 17th day of September 1937 she being seized of the real estate mentioned, which said real estate upon her death decended to and vested in her heirs at law and next of kin as tenants in common, to wit: the following parties:

Olive A. Recher, a daughter whose husband's name is John L. Recher, who reside near Thurmont, Frederick County, Maryland.

Brinton Toms, a son whose wife's name is Grace Toms, who reside at Thurmont, Frederick County, Maryland.

Frank Toms, a son whose wife's name is Ida Toms, who reside at Waynesboro, in the State of Pennsylvania.

Rene Draper, a daughter whose husband's name is Clinton Draper, who reside at Midale, Sask., in the Dominion of Canada.

Dora Ridenour, widow, a daughter who resides at Smithsburg, Washington County, Maryland.

Olivia Myers, a daughter, whose husband's name is John Myers, who reside at Glen Cove, Baltimore County, Maryland.

Howard Toms, unmarried, a son who resides at 7349 Gorman Street, Philadelphia, Pennsylvania.

Wellington Toms, whose wife's name is Jettie Toms, who resides at Waynesboro, in the State of Pennsylvania.

Mildred Begomia a grand daughter, whose husband's name is A. Keller Begomia, who reside