

BILL OF COMPLAINT

Lydia S. R. Snyder	"	No. 13825 Equity
vs.	"	In the Circuit Court
Marcia F. Watkins and Amos F. Watkins, her husband, Ivia E. Watkins and C. Herbert Watkins, her husband, Margie S. Walker and William G. Walker, her husband, Verva M. Clark and Philip Clark," her husband, and Marcia F. Watkins and Ivia E. Watkins, Executrices of the Last "	"	For Frederick County
Will and Testament of Vernon A. Snyder, deceased.	"	In Equity.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Lydia S. R. Snyder respectfully shows unto your Honors:

1. That Vernon A. Snyder, late of Frederick County, Maryland, deceased, departed this life on or about the 26th day of November, 1922, seized and possessed of all that tract or parts of tracts of land situate, lying and being in New Market Election District, Frederick County, Maryland, being part of a tract of land called "Pretty Sally" and part of a tract of land called "The Resurvey on Hobb's Purchase," containing 142 acres of land, more or less; being all and the same real estate which was devised unto the said Vernon A. Snyder by the Last Will and Testament of Mary A. Simmons, late of Frederick County, Maryland, deceased, dated the 8th day of December, 1879, and duly probated and recorded in Liber H. L. No. 1, Folio 92, one of the Will Records of Frederick County, Maryland, a certified copy of which said Will is filed herewith as Exhibit "A" and which is prayed may be taken and considered a part hereof.

2. That the said Vernon A. Snyder died testate leaving a Last Will and Testament dated the 25th day of July, 1910, which said Will has been duly admitted to probate and recorded in Liber G. E. S. No. 1, Folio 36, one of the Will Records of Frederick County, Maryland; that letters testamentary on the estate of said decedent were granted unto Marcia F. Watkins and Ivia E. Watkins, Executrices named in said Will; that said Will contains the following provisions: "After my debts and funeral charges are paid, I devise and bequeath as follows: I devise and bequeath unto my wife, Lydia S. R. Snyder, all my property, both real and personal, during her natural life only, then to be sold and divided equally to my four daughters, Marcia Fairy Snyder and Ivia Estella Snyder and Verva Mabel Snyder and Margie Sybilla Snyder, share and share alike," all of which will more fully appear by reference to a certified copy of said Will which is filed herewith as Exhibit "B" and which is prayed may be taken and considered a part hereof.

3. That your Oratrix is the widow of the said Vernon A. Snyder and is the life tenant named and designated in the Will of said decedent, and that the following are the four daughters of your Oratrix and said decedent, also named in said Will, together with their respective spouses, all of whom are sui juris, to-wit: Marcia F. Watkins, whose husband's name is Amos F. Watkins; Ivia E. Watkins, whose husband's name is C. Herbert Watkins, Margie S. Walker, whose husband's name is William G. Walker; and Verva M. Clark, whose husband's name is Philip Clark.

4. That the real estate hereinbefore mentioned is no longer occupied by the life tenant, who, because of her advanced age and physical impairments, is unable to give the same her personal supervision and attention, and that by reason thereof the improvements on said real estate are now in a seriously depreciated condition, needing immediately extensive repairs; that your Oratrix, as hereinbefore explained, is unable to personally supervise farm operations and for the last several years has been unable to rent said farm to profitable advantage, and that by reason thereof said farm was not operated in any manner during the crop season of 1938; that your Oratrix is physically and financially unable to operate said farm in a husbandlike manner or to procure the services of agents