

## BILL OF COMPLAINT

Thelma M. Forrest and	*	No. 14828 Equity
Theodore C. Forrest, her husband	*	In the Circuit Court for
vs.	*	Frederick County, sitting
Virginia Copenhaver and Paul	*	as a Court of Equity.
Copenhaver, her husband, Betty	*	
Lee Carr, infant, and the Peoples	*	
National Bank in Brunswick, a	*	
body corporate, judgment creditor	*	

\* \* \* \* \*

TO THE HONORABLE THE JUDGES OF SAID COURT:

The Bill of Complaint of Thelma M. Forrest and Theodore C. Forrest, her husband, of Frederick County, Maryland, respectfully shows unto your Honors:

FIRST: That James H. Thompson, late of Frederick County, Maryland, departed this life on or about the 24th day of October, 1940, seized and possessed of two lots or parcels of ground situate, lying and being in Brunswick, in Frederick County, Maryland, both lots being improved with dwelling houses erected thereon, and being designated as Lots Nos. 1 and 2, in Block 17 on a Plat of Brunswick duly recorded in Liber J. L. J. No. 1, folio 166, one of the Land Records of Frederick County, the said James H. Thompson having acquired the hereinbefore described lots by virtue of the following deeds, to-wit:

1) Deed from William L. Gross and Annie C. Gross, his wife, to James H. Thompson, dated September 15, 1906, and recorded in Liber S.T.H. No. 278, folio 122, one of the Land Records of Frederick County.

2) Deed from John W. Bowers and Mary E. Bowers, his wife, to James H. Thompson, dated May 12, 1917, and recorded in Liber 322, folio 146, one of the Land Records of Frederick County.

Certified copies of said deeds are filed herewith as Exhibits Nos. 1 and 2, respectively, which are prayed may be taken and considered as part of this Bill of Complaint.

SECOND: That the said James H. Thompson died intestate on or about the 24th day of October, 1940, as hereinbefore set forth, leaving surviving him as his only heirs-at-law his wife, Annie E. Thompson, who died intestate on or about the 24th day of October, 1941, and the following child and grandchildren, to-wit:

1) Thelma M. Forrest, a daughter, who intermarried with Theodore C. Forrest, both of whom live in Brunswick, Frederick County, Maryland, and are the Complainants herein.

2) And the following children of Katie I. Carr, a daughter, who intermarried with one Russell Carr, and who departed this life intestate on or about January 9th, 1925, leaving surviving her:

(a) A daughter, Virginia, who intermarried with Paul Copenhaver, and who live in the city of Martinsburg, in the State of West Virginia, and

(b) Betty Lee Carr, a daughter, who is an infant and who lives in Hedgesville, West Virginia, but is temporarily residing in Brunswick, Maryland, with the Complainants herein.

THIRD: That the property of which the said James H. Thompson died seized and possessed, as hereinbefore described, is subject to the lien of a judgment in favor of Peoples National Bank in Brunswick, a body corporate, one of the Defendants herein, originally in the amount of Eight Hundred Ninety-eight Dollars and Sixty-three Cents (\$898.63), but now reduced to Four Hundred and Seventy-three Dollars (\$473.00), which said judgment is designated as No. 173 Trials, September Term, 1935, and recorded in Transcript No. 25, folio 192, a copy of which said judgment is filed herewith and marked Exhibit 3, and which it is prayed may be taken and considered as a part hereof.

FOURTH: That the real estate hereinbefore described is constantly depreciating in value and cannot be divided without loss or injury to the parties interested therein, and