

BILL OF COMPLAINT FOR SALE OF REAL ESTATE

Mary B. Ridenbaugh and Earl W. Ridenbaugh, her husband	"	No. 15284 Equity
	"	In the Circuit Court
Vs.	"	for Frederick County.
	"	
Charles T. Colbert, Margaret Colbert, his wife, Anna Louella Spring and Fred Spring, her hus- band, Frederick County National Bank, judgment creditor, Elmer Michael, judgment creditor	"	

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Mary B. Ridenbaugh and Earl W. Ridenbaugh, her husband, respectfully represents unto your Honorable Court:

FIRST: That a certain John A. Colbert, late of Frederick County, Maryland, departed this life on or about December 29, 1943, seized and possessed of two parcels of land, to-wit: (1) Parcel of land containing about one-half acre of land, more or less, described in a deed from Earl W. Ridenbaugh and Mary B. Ridenbaugh, his wife, to John A. Colbert and Annie M. Colbert, dated April 21, 1930, and recorded in Liber No. 374, folio 249 &c., one of the Land Records for Frederick County, the original of which is filed herewith marked Exhibit No. 1 to this Bill of Complaint, which, together with all other exhibits, it is prayed may be taken and considered as a part hereof; (2) parcel of land containing 142½ square perches of land, more or less, described in a deed from Frank L. Stoner to John A. Colbert and Annie M. Colbert, his wife, dated October 8, 1931, and recorded in Liber No. 380, folio 480 &c., one of the Land Records for Frederick County, the original of which is filed herewith marked Exhibit No. 2 to this Bill of Complaint.

SECOND: That the said John A. Colbert left a last Will and Testament, recorded in Liber R. L. L. No. 1, folio 514, one of the Will Records in the office of the Register of Wills for Frederick County, a certified copy of which is filed herewith marked Exhibit No. 3 to this Bill of Complaint,

THIRD: That the said Annie M. Colbert is now dead, having predeceased her husband.

FOURTH: That under the terms of the said last Will and Testament the said John A. Colbert devised all the rest and remainder of the real estate to his three children, namely;

Charles T. Colbert, whose wife's name is Margaret Colbert, and who reside at Point of Rocks, Frederick County, Maryland
Mary B. Ridenbaugh, whose husband's name is Earl W. Ridenbaugh, and who reside at Point Rocks, Frederick County, Maryland
Anna Louella Spring, whose husband's name is Fred Spring and who reside at Middle River, Baltimore County, Maryland

FIFTH: That the Frederick County National Bank, a body corporate, is a judgment creditor of John A. Colbert, to the extent of \$800.00, being No. 103 Trials, September Term, 1938, said judgment being recorded in Transcript Docket No. 26, folio 131, certified copy of which is filed herewith marked Exhibit No. 4 to this Bill of Complaint.

SIXTH: That a certain Elmer Michael is a judgment creditor of the said John A. Colbert to the extent of \$171.83, being No. 61 Trails, May Term, 1943, said judgment being recorded in Transcript Docket No. 27, folio 157, certified copy of which is filed herewith marked Exhibit No. 5 to this Bill of Complaint.

SEVENTH: That the said Elmer Michael is also a judgment creditor of the said John A. Colbert to the extent of \$653.71, being No. 62 Trails, May Term, 1943, said judgment being of record in Transcript Docket No. 27, folio 157, certified copy of which is filed herewith marked Exhibit No. 6 to this Bill of Complaint.

EIGHTH: That the property described in said Exhibits Nos. 1 and 2 cannot be divided