

RACHEL L. WEBSTER and  
ROBERT E. LEE

NO. 19921 EQUITY

VS.

IN THE CIRCUIT COURT

LEWIS WEBSTER, ELSIE SWAIN and  
OATH SWAIN, her husband, WILLIAM  
F. LEE and CHARLOTTE LEE, his  
wife, CARRIE WINE and GEORGE WINE,  
her husband, LOUISE EASTERDAY and  
FRANKLIN EASTERDAY, her husband,  
MYRTLE HENLEY and ALBERT HENLEY,  
her husband, ETHEL POOLE and MONROE  
POOLE, her husband, DANIEL W. LEE, JR.  
and EVELYN S. LEE, his wife and BETTY  
LEE

FOR FREDERICK COUNTY

MARYLAND

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TO THE HONORABLE, THE JUDGES OF THE CIRCUIT COURT FOR FREDERICK COUNTY, SITTING AS A COURT OF EQUITY:

The Bill of Complaint of Rachel L. Webster and Robert E. Lee, by Richard E. Zimmerman, their Attorney, respectfully shows unto your Honors:

FIRST: That Daniel W. Lee, Sr., the father of your Complainants, Rachel L. Webster and Robert E. Lee, departed this life on the 29th day of January, 1962, leaving a Last Will and Testament, by the terms of which he devised all of his real estate unto his wife, Maggie S. Lee; a certified copy of which is herewith filed as "Exhibit No. 1", and which, together with all other exhibits herewith produced is prayed to be taken and considered as a part of this Bill of Complaint.

SECOND: That the said wife, Maggie S. Lee, departed this life on November 2, 1961 leaving a Last Will and Testament which was duly probated and admitted to record and recorded in Liber T.M.E. No. 2, Folio 104, one of the record books for Wills in the office of the Register of Wills for Frederick County; a certified copy of which is herewith filed as "Exhibit No. 2", and which, together with all other exhibits herewith produced is prayed to be taken and considered as a part of this Bill of Complaint, by the terms of which said Will she devised all real estate unto her husband, Daniel W. Lee, Sr.

THIRD: That the said Maggie S. Lee and Daniel W. Lee, Sr. were seized and possessed of a certain parcel of land containing 120 acres of land, more or less, being the same real estate heretofore conveyed to Daniel Webster Lee, Sr. and Maggie S. Lee by James H. Smith and Alice C. Smith, his wife, by deed dated the 24th day of March, 1927 and recorded in Liber No. 362, Folio 24, one of the Land Records of Frederick County, and more particularly described as follows: