

PETITION

PEARL EDNA WILLIARD, INDIVIDUALLY, AND AS \* NO. 17007 EQUITY  
NEXT FRIEND FOR EVELYN MARIE FERGUSON,  
INFANT

\* IN THE CIRCUIT COURT FOR

VS.

EVELYN MARIE FERGUSON, INFANT

\* FREDERICK COUNTY, MARYLAND

\* \* \* \* \*

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Pearl Edna Williard, individually, and as next of friend for Evelyn Marie Ferguson, infant, by Edward D. Storm, her attorney, respectfully represents:

1. That she is the mother of Evelyn Marie Ferguson, a female infant, born on February 25, 1941.

2. That she was formerly known as Pearl Edna Oswald, widow of Keller Preston Oswald, a resident of Washington County, Maryland who died in the year 1936.

3. That on or about September 29, 1942, your Petitioner purchased a parcel of land in Frederick County, Maryland from Charles R. Kline and Hilda M. Kline, his wife, as evidenced by the original deed filed herewith and marked "PETITIONER'S EXHIBIT 'A'".

4. That at the time of said purchase, your Petitioner was a widow and the sole support of the said infant child and without understanding the legal effects of having her said infant child's name on the deed, she accepted the aforesaid deed under the mistaken belief that she owned the said property absolutely and that the said deed would be effective in the nature of a will and only in case of her death while being seized of said property would her said child have any beneficial interest in the aforesaid property.

5. That at the present time, your Petitioner is the wife of Joseph W. Williard with whom she has joined in an agreement to purchase certain real estate in Washington County from other persons in the Williard family, it being the intention of your Petitioner and her husband to sell the real estate which is subject to these proceedings and use the proceeds therefrom to pay for the real estate which they have planned and agreed to purchase as above set forth.

6. That your Petitioner believes and alleges that since the interest of the said infant, Evelyn Marie Ferguson, in the aforesaid property was created by

EDWARD D. STORM  
ATTORNEY AT LAW  
FREDERICK, MARYLAND