BILL OF COMPLAINT

ELIZABETH C. RODDY, Administratrix of the estate of Anna Louise McGrath, also known as LULU MCGRATH, late of Frederick County, deceased,; ELIZABETH C. RODDY and WILLIAM M. RODDY, her husband,; JOHN McGRATH, widower,; JAMES McGRATH and MARIE McGRATH, his wife,; SARAH McCARREN and CLARENCE McCARREN, her husband,	No. 17041 EQUITY IN THE CIRCUIT COURT for FREDERICK COUNTY IN EQUITY
vs.	
WILLIAM F. ZURGABLE, widower,: WILLIAM F. ZURGABLE, Jr., and MARGARET ZURGABLE, his wife,; MARY ZURGABLE, unmarried,; LILLIAN ZURGABLE NEWTON and HAROLD NEWTON, her husband,: JAMES L. ZURGABLE and RUTH ZURGABLE, his wife,; LOUISE ZURGABLE SELL and PAUL SELL, her husband,; NELLIE ZURGABLE CREW and CHARLES CREW, her husband,; ELSIE ZURGABLE TOPPER and GUY TOPPER, her husband.	

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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 Elizabeth C. Roddy, Administratrix of the estate of Anna Louise McGrath, also known as Lulu McGrath, late of Frederick County, deceased,: Elizabeth C. Roddy and William M. Roddy, her husband: John McGrath, widower,; James McGrath and Marie McGrath, his wife,; Sarah McCarren and Clarence McCarren, her husband, by Stewart Hobbs Brown, their attorney, respectfully shows unto your Honors:

FIRST: That Anna Louise McGrath, also known as Lulu McGrath, late a resident of Frederick County, State of Maryland, departed this life in the month of October, the 12th day, Nineteen Hundred and Forty-six, seized and possessed of two tracts of land and premises situate, lying and being in Emmitsburg District, Frederick County, State of Maryland.

SECOND: That one of the tracts of land hereinabove mentioned and herein designated as Parcel No. 1 is all that lot or parcel of land, situate, lying and being on the West side of Gettysburg Street, in the Town of Emmitsburg; it being all and the same real estate which was heretofore conveyed to Lulu McGrath, by a deed dated November 29th, 1915, from Annie McGrath, and duly recorded

Stewart H. Brown
Attorney at Law
Frederick,
Maryland