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Susan M. Fickling and Thomas J. Fickling, her husband, Elinor M. Hughes and Byron Hughes, her husband, Inez Willard, unmarried, Susan M. Fickling, Trustee of Inez Willard under the last will and testament of Ida M. Markey, late of Frederick County, deceased, ~~and~~ D. John Markey, Susan M. Markey and Elinor M. Hughes, Executor and Executrixs, Administrator and Administratrixs of the last will and testament of Ida M. Markey, late of Frederick County, deceased, Home Owners' Loan Corporation and The Domestic Building Association of Frederick County, respectfully represents as follows, to wit: ^

1. That said plaintiff is a corporation organized under the Acts of Congress of the United States of America, and that the defendants, Willard Hanshew Markey and Leona Palmer Markey his wife, Elinor M. Fickling, unmarried, Nancy Virginia Markey, unmarried, D. John Markey, Jr., and Mary Alice Markey, his wife, Mary Elizabeth Markey Hooper and James Harold Hooper, her husband, and ~~and~~ D. John Markey are residents of Frederick County, State of Maryland, and are all over the age of twentyone (21) years, and that the defendant Susan M. Fickling and Thomas J. Fickling, her husband, are non-residents of the State of Maryland, and reside in the City of Columbia, in the State of South Carolina; and that the defendant Elinor M. Hughes and Byron Hughes, her husband, are likewise non-residents of the State of Maryland, and reside in the city of New York, State of New York; and that the defendant Inez Willard is a non-resident of the State of Maryland, and is now confined in a hospital for the insane in the City of Staunton, State of Virginia, and that all of said defendants are over the age of twenty-one (21) years; and that the defendant, the Home Owners' Loan Corporation is a corporation organized under the Acts of Congress of the United States of America and maintains an office in the City of Baltimore, in said State of Maryland,