No. 18887 Equity
In the Circuit Court
for Frederick County
In Equity

IN THE

CIRCUIT COURT

FOR

BALTIMORE CITY

MARY ELIZABETH TULL
244 Glenmore Avenue
Catonsville 28,
Baltimore County, Maryland

MINNIE MOONEY
241 Springton Road
Upper Darby, Pennsylvania

ROBERT WAGNER
Fallstown,
Harford County, Maryland

VS.

ARMIN WAGNER
324 East Twenty-seventh Street;
Baltimore 18, Maryland

Bill of Complaint

To the Honorable, the Judge of the said Court:

Your orators, complaining, say:

1. That by deed dated September 28, 1951, recorded among the Land Records of Baltimore City in Liber M. L. P. No. 8603, folio 473, M. Eleanor Farrell (unmarried) conveyed to Charles W. Wagner, a widower, two lots of ground in Baltimore City, State of Maryland, for life, with certain powers of disposition, and "from and immediately after the death of the said Charles W. Wagner, the same or so much thereof or any interest therein as may not have been disposed of by the said Charles W. Wagner, under this power, unto SISTER MARY ROBERTA (nee Wagner); Mrs. THOMAS MOONEY (nee Minnie Wagner); MARY ELIZABETH TULL (nee Wagner); ROBERT WAGNER and ARMIN WAGNER , share and share alike, their heirs and assigns, in fee simple". That said deed is filed herewith, as a part hereof, marked "Exhibit No. 1".

2. That the properties conveyed by the deed mentioned in paragraph 1 were the fee simple property in the City of Baltimore known as No. 324 East Twenty-seventh Street, and the leasehold property in the City of Baltimore known as No. 3217 St. Paul Street, subject to an annual ground rent of $180.00. That the deed aforesaid purports to convey the property No. 3217 St. Paul