

EDWIN F. NIKIRK and DOROTHY J. NIKIRK, his wife, PARENTS, NATURAL GUARDIANS, and NEXT FRIENDS OF EDWIN F. NIKIRK, II, and THOMAS C. NIKIRK, Infants	:	NO. 20,123 EQUITY
	:	IN THE CIRCUIT COURT FOR
	:	FREDERICK COUNTY,
ON	:	MARYLAND, SITTING AS A
PETITION	:	COURT OF EQUITY

: : : : :

PETITION TO AMEND BILL OF COMPLAINT

The Petition of Edwin F. Nikirk and Dorothy J. Nikirk, his wife, Parents, Natural Guardians, and Next Friends of Edwin F. Nikirk, II, and Thomas C. Nikirk, Infants, respectfully represents unto your Honorable Court:

FIRST: That since the filing of the Bill of Complaint and other papers and the taking of testimony in the above entitled cause, it appears that the proceedings do not fully comply with the Rules of the Court as more particularly recited as Rule 71 for proceedings of this nature in Equity.

SECOND: That in order to comply with said Rules of Court, the Infants, Edwin F. Nikirk, II, and Thomas C. Nikirk, should be made party Defendants and duly summoned to appear and answer to an amended Bill of Complaint.

THIRD: That in the further interest of expediting these proceedings and reducing the amount of additional costs which will be incurred in complying with said Rules, the withdrawal of the appointment of and answer by the guardians Ad Litem and the testimony heretofore filed in said cause is desirable.

FOURTH: That the Decree submitted by your Petitioners and passed by your Honorable Court should also be voided for the reasons above recited.

WHEREFORE, your Petitioners pray your Honorable Court to pass an Order authorizing the filing of an amended Bill of Complaint in this cause, in which the said Edwin F. Nikirk, II, and Thomas C. Nikirk, Infants, be made party defendants and duly summoned to appear and answer said Complaint, and that further your Petitioners be authorized to withdraw the appointment of and answer by the Guardians Ad Litem and testimony heretofore filed and further to void the Decree passed in this cause.

Edwin F. Nikirk
Edwin F. Nikirk

Dorothy J. Nikirk
Dorothy J. Nikirk
Natural Parents, Guardians, and Next Friends
of Edwin F. Nikirk, II, and Thomas C. Nikirk,
Infants