

WILLIAM C. WOERNER AND	:	NO. 20,803 EQUITY
EVA MARTHA WOERNER, his wife,	:	IN THE CIRCUIT
et al	:	COURT FOR
VS.	:	FREDERICK
	:	COUNTY
MARGARET WOERNER CARMACK and	:	IN EQUITY
EMORY L. CARMACK, her husband,	:	
et al	:	
	:	

PETITION AND ANSWER

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition and Answer of Glenn Calvin Wilhide, Jr. and Dorothy M. Wilhide, his wife, by H. Reese Shoemaker, Jr., their Solicitor, respectfully represents unto your Honorable Court:

FIRST: That by an amendment to an Amended Bill of Complaint for partition of real estate, filed in the above entitled cause on March 4, 1965, it was alleged that the parties to said proceeding are the living heirs at law and next of kin of Mary Lorraine Shuff, deceased, all of said parties being first cousins of the same degree, of the said Mary Lorraine Shuff.

SECOND: That your Petitioner, Glenn Calvin Wilhide is also a first cousin of the said Mary Lorraine Shuff, deceased, by virtue of the fact that his father, Glenn Calvin Wilhide, was a half-brother of Addie Wilhide Woerner, the mother of Mary Lorraine Shuff, the said Glenn Calvin Wilhide and Addie Wilhide Woerner having been a half-brother and half-sister to each other by virtue of the fact that they both had the same father.

THIRD: That, except as above set forth, your Petitioners admit the allegations contained in the first, second, third, fourth, fifth, sixth, seventh and eighth paragraphs of the said amendment to the Amended Bill of Complaint filed in these proceedings.

TO THE END THEREFORE:

(1) That your Honorable Court may pass an Order directing that the said Glenn Calvin Wilhide, Jr. and Dorothy M. Wilhide, his wife, be made party defendants in these proceedings.