

LLOYD C. DERN
and
PAUL B. DERN,

EXECUTORS OF THE ESTATE
of
CARRIE B. DERN, deceased

vs.

THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES,
DESCENDANTS OR SUCCESSORS

IN INTEREST,

OF JOHN CLOSE, deceased

No. 21,390 EQUITY

IN THE CIRCUIT COURT FOR

FREDERICK COUNTY, MARYLAND

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BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Lloyd C. Dern and Paul B. Dern, Executors of the Estate of Carrie B. Dern, deceased, Orators, by Frederick J. Bower, their Solicitor, respectfully presents unto your Honors:

FIRST: That Carrie B. Dern died on the sixteen day of November 1965, testate. The Last Will and Testament of the said Carrie B. Dern being recorded in Liber T.M.E. 4, Folio 72, one of the Will Books kept in the office of the Registrar of Wills for Frederick County, Maryland. A copy of the Last Will and Testament of the said Carrie B. Dern being filed herewith, prayed to be taken as a part hereof, and marked Exhibit Number I.

SECOND: That your Orators were granted letters testamentary on the 29th day of November, 1965.

THIRD: That the Last Will and Testament of Carrie B. Dern directed her Executors to sell, assign, and convey and convert into cash all of her Estate and Property, real, personal and mixed.

FOURTH: That the Estate of Carrie B. Dern consists of three tracts or parcels of Real Estate lying and being in the Emmitsburg Election District, Frederick County, Maryland.

FIFTH: That the aforesaid three tracts or parcels of Real Estate are all and the same parcels of Real Estate given and devised unto the said Carrie B. Dern, to hold the same during the term of her life with full power to devise the same by her Last Will as she may seem fit, by the Last Will and Testament of John Close, a copy of this Will