

Worthington Hilleary, dated February 9, 1914, and recorded in Liber 308, folio 198, one of the Land Records of Frederick County, Maryland; a copy of said Deed is attached to the Bill of Complaint and prayed to be taken as a part thereof, marked "Exhibit 4."; that said Deed marked Exhibit 4, aforesaid, recites that Sarah Ellen Knapp Addoms is the "wife of Charles Addoms", but said Charles Addoms did not join in said conveyance.

That although the said Sarah Ellen Knapp Addoms, the wife of Charles Addoms, is deceased and the said Charles Addoms has failed to file an election to take dower with the Orphans' Court or Register of Wills for Frederick County as required by Article 46, Section 4, of the Annotated Code of Maryland, 1957 Edition, within the time prescribed by law, the failure of the said Charles Addoms to join in the aforesaid Deed dated February 9, 1914, constitutes a cloud on the record title of your Complainants to the property which is the subject of these proceedings; that any claim of dower which may be asserted by said Charles Addoms is without right, and he has no estate, right, title or interest in said property or any portion thereof.

That although Ann T. Hilleary, Janet H. Hilleary Botts, Clarence L. Hilleary, Ridgely B. Hilleary, Richard W. Hilleary, H. Worthington Hilleary and William Murray Hilleary are deceased and their unknown spouses have failed to file an election to take dower with the Orphans' Court or Register of Wills of Frederick County as required by Article 46, Section 4, of the Annotated Code of Maryland, 1957 Edition, within the time prescribed by law, the failure of the aforesaid spouses of the aforesaid Grantors to join in the Deed dated September 12, 1931, constitutes a cloud on the record title of your Complainants to the property which is the subject of these proceedings; that any claim of dower asserted by the aforesaid spouses of the aforesaid Grantors is without right, and they have no estate, right, title or interest in said property or any portion thereof.

That your Complainants and their Attorneys have made reasonable efforts to ascertain the address of Charles Addoms aforesaid and have made reasonable efforts to ascertain the marital status of the aforesaid Grantors in Exhibit 3. and the names and addresses of any of said persons, but have been unsuccessful in their efforts to do so.