

CHARLES M. PLUNKERT and	*	NO. 21,983 EQUITY
DOROTHY K. PLUNKERT, his wife	*	
and HOWARD T. PERKINS, JR. and	*	IN THE CIRCUIT COURT
BETTY CATHERINE PERKINS, his wife*	*	
	*	FOR
VS.	*	
	*	FREDERICK COUNTY
THE UNKNOWN HEIRS, DEVISEES,	*	
PERSONAL REPRESENTATIVES,	*	MARYLAND
DESCENDANTS OR SUCCESSORS IN	*	
INTEREST, OF JACOB P.	*	
HUMMER, DECEASED	*	
	*	

* * * * *

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Charles M. Plunkert and Dorothy K. Plunkert, his wife, and Howard T. Perkins, Jr., and Betty Catherine Perkins, his wife, Complainants, by Ralph L. Gastley, Jr. and GASTLEY & STILLRICH, their Solicitors, respectfully represents unto your Honors:

FIRST: That Charles M. Plunkert and Dorothy K. Plunkert, his wife, are the owners, in fee simple, of all that lot or parcel of land, situate, lying and being in Lewistown Election District, Frederick County, Maryland, along or near the public road leading from Mountindale to the Frederick City Reservoir and being on the Northeast side of the creek known as Fishing Creek, that was conveyed unto Raymond W. Wiles and Katherine E. Wiles, his wife, by deed from Alva F. Rice and Mattie M. Rice, his wife, by date of September 3, 1943, and recorded in Liber 439, Folio 421, one of the Land Records of Frederick County, LESS, HOWEVER, (1) all that lot of land conveyed to Lewis S. Rice by deed dated August 26, 1950,

GASTLEY & STILLRICH
ATTORNEYS AT LAW
FREDERICK, MARYLAND