

ALICE C. KUGLER, ET AL * NO. 19251 EQUITY
VS. * IN THE CIRCUIT COURT FOR
MARY E. OTT, ET AL * FREDERICK COUNTY, MARYLAND

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TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Ethel Welty Gelwicks, one of the Defendants in these proceedings, respectfully shows your Honors:

FIRST: That under the Order of Publication passed in these proceedings, non-resident Defendants have until December 22, 1959, to show cause or answer the Bill of Complaint of the Plaintiffs.

SECOND: That in order for this Defendant to properly answer and defend, it will be necessary for her to review or cause to be reviewed many ancient records, both public and private, and she would like additional time in which to file her answer so that this work can be done prior to the filing thereof.

THIRD: That the orderly progress of this proceeding will not be held up by the granting of an extension of time to your Petitioner for answering.

WHEREFORE, Your Petitioner Prays that your Honorable Court will grant an extension of time for the filing of the Defendant's pleadings in this proceeding.

And as in duty bound, etc.

Edward D. Storm

Edward D. Storm, Attorney

STATE OF MARYLAND, FREDERICK COUNTY, TO-WIT:

I hereby certify that on this 11th day of November, 1959, before me, the subscriber, a Notary Public for the State and County aforesaid, personally appeared Ethel Welty Gelwicks and made oath in due form of law that all the matters and things stated in the foregoing Petition are true and bona fide as therein set forth, and that this Petition is not filed with any dilatory intention.

Witness my hand and Notarial Seal:

Mary Patricia Lingg
NOTARY PUBLIC

EDWARD D. STORM
ATTORNEY AT LAW
FREDERICK, MARYLAND