

FRED R. McCRUMB, JR.
Glenariff Farms
Libertytown, Maryland 21762

Plaintiff

IN THE
CIRCUIT COURT

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vs.

GLORIA E. McCRUMB
13950 Northwest Passage
No. 109
Marina Del Ray, California 90291

FOR

FREDERICK COUNTY

~~SERVE ON:~~

~~James Willard Davis, Esquire
Dulany & Davis
123-127 East Main Street
Westminster, Maryland 21157~~

No. 25,075 Equity

Defendant

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Bill of Complaint of Fred R. McCrumb, Jr., by Roland R. Bounds and Bounds & Short, his attorneys, respectfully shows unto Your Honor:

1. The object of this Bill of Complaint is to have this Court decree a sale in lieu of partition of the hereinafter described property which is held by the Plaintiff, Fred R. McCrumb, Jr. and the Defendant, Gloria E. McCrumb, as tenants in common.

2. The Plaintiff, Fred R. McCrumb, Jr., and the Defendant, Gloria E. McCrumb, acquired title, in fee simple, as tenants by the entireties, by Deed dated October 9, 1962, and recorded among the Land Records of Frederick County in Liber 675, Folio 139, to a certain parcel of ground and the improvements thereon, situate, lying and being in Frederick County and being more fully described as follows:

BEGINNING for the same at an iron tee bar with Registered Land Surveyors Cap No. 2046, now set in the ground on the south side of Liberty Road, as shown on the Maryland State Road Commission Plat No. 11795, thence as now surveyed by D. K. Sutcliffe and Associates with north reference to said Plat, and running and binding on said south side of Liberty Road the five following courses and distances, thence by a line curving to the left for a distance of 395.12 feet with a radius of 25,923.18 feet to a point of compound curve, which arc is subtended by a chord bearing south 63 degrees 03 minutes 52 seconds east 395.09 feet, thence still by a line curving to the left for a distance of 88.28 feet with