

LACE, INC., a Maryland Corporation : IN THE CIRCUIT COURT FOR  
26323 Ridge Road  
Damascus, Maryland 20750  
PLAINTIFF : FREDERICK COUNTY, MARYLAND

VS. : NO. 24,272 EQUITY

THE UNKNOWN HEIRS, DEVISEES,  
PERSONAL REPRESENTATIVES,  
DESCENDANTS OR SUCCESSORS IN :  
INTEREST OF GEORGE W. CUTSAIL,  
deceased, SARAH CUTSAIL, deceased,  
CATHERINE WATKINS, deceased, and :  
ANTONIA C. HOUSEN, deceased  
Addresses Unknown

DEFENDANTS :  
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BILL OF COMPLAINT TO QUIET TITLE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Lace, Inc., a Maryland Corporation, Petitioner,  
by W. Jerome Offutt and Sidney L. Bloom, its Solicitors, respectfully repre-  
sents unto your Honors:

FIRST: That as of December 10, 1969, your Petitioner was the owner in  
fee simple of all those two (2) pieces or parcels of land situate, lying and  
being in the New Market Election District, Frederick County, Maryland, and  
being more particularly described as follows:

PARCEL NO. 1: All that piece or parcel of land situate, lying and being  
in the New Market Election District, Frederick County, Maryland, and being  
more particularly described as follows:

BEGINNING for the same at the end of 86 perches on the seventeenth line of  
a tract of land called the "Range" and running with said line, correcting the  
bearing to N. 25° E. 35 perches to the end of said line, thence S. 80° E.  
24 1/2 perches to the end of 60 perches on the 1st line of "Nonesuch," then with  
said land S. 39° E. 58 perches to a stone, N. 50° E. 60 perches to a stone at  
the end of the last line in a deed from Mary Sane to John Rian, then by and  
with the closing line thereof, then S. 23° W. 89 perches, then by a straight  
line to the place of beginning, containing thirty-one (31) acres of land, more  
or less, BEING part of the real estate described by corrected metes and bounds  
description in a Confirmatory Deed from John C. Stup and L. Olive Stup, his wife,  
to Lace, Inc., dated December 10, 1969 and recorded in Liber 825, folio 741, one  
of the Land Records of Frederick County, Maryland, a copy of said Confirmatory  
Deed attached hereto marked "Exhibit 1" and prayed to be incorporated herein,  
said real estate containing 117.401 acres of land, more or less, as surveyed  
by John D. Mause, Registered Land Surveyor, Frederick County, Maryland.

PARCEL NO. 2: All that piece or parcel of land situate, lying and being  
in the New Market Election District, Frederick County, Maryland, and being more  
particularly described as follows:

BEGINNING at the end of the 4th line of a deed from John E. Grimes and  
Sarah J. Grimes, his wife, to George W. Cutsail, and running South twenty-four  
deg. West thirty perches, North Seventy and a half deg. West, One Hundred  
and three perches, to James H. Lawson Line then with said Lawson's line North  
twenty-five deg. east, thirty-five and a quarter perches; to the end of the  
2nd line in said Cutsail's deed, thence with the lines of said deed, South

LAW OFFICES  
OFFUTT,  
HAUGH & BLOOM, P.A.  
OFFUTT BUILDING  
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