

VIRGINIA M. CREED
San Antonio, Texas

NO. 26656 EQUITY

BY: Eugene Creed, her attorney
in fact, 330 Broadmoor Road
Baltimore, Maryland

PLAINTIFF

vs.

NELLIE D. VINAL
address unknown

DEFENDANT

IN THE
CIRCUIT COURT
FOR
FREDERICK COUNTY,
MARYLAND

and to all other persons,
unknown, claiming any right,
title, estate, lien or interest
in the real property described
in the complaint adverse to
plaintiff's ownership, or any
cloud upon the plaintiff's title*
thereto

* * * * *

BILL OF COMPLAINT TO
QUIET TITLE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Virginia M. Creed, Plaintiff, by Eugene Creed, her
attorney in fact, by Carville M. Downes and Weinberg, Michel &
Stern, her attorneys respectfully says:

1. That the Plaintiff is the owner in fee simple and in
possession of Lot 12A, east side of Jefferson Blvd., Braddock
Heights, Braddock Election District, Frederick County, State of
Maryland together with the buildings and improvements thereon by
deed dated May 19, 1944 and recorded among the Land Records of
Frederick County in Liber 482, page 478 from Virdie May Creed
unto Virginia M. Creed. The said Virdie May Creed being the
mother of Virginia M. Creed as being shown on a copy of said Deed
attached hereto and prayed to be taken as Plaintiff's Exhibit A.

2. That the said Virdie May Creed acquired fee simple
title in the subject property by deed dated January 10, 1928 and
recorded among the Land Records of Frederick County in Liber 364,

WEINBERG, MICHEL,
& STERN
10 WEST COLLEGE TERRACE
AND
106 WEST SECOND STREET
FREDERICK, MARYLAND