

MILDRED MARIE WELTY
224 East Patrick Street
Frederick, Maryland 21701

vs

CLARENCE A. WELTY
819 Motter Avenue
Frederick, Maryland 21701

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NO. 24,186 EQUITY
IN THE
CIRCUIT COURT
FOR
FREDERICK COUNTY, MARYLAND

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Mildred Marie Welty, by G. Edward Dwyer, Jr., and Zimmerman and Aldridge, her Solicitors, respectfully represents unto your Honorable Court:

FIRST: That on the 5th day of May, 1972, the Respondent, Clarence A. Welty, executed and delivered a Deed unto Charles R. Smith whereby he did grant and convey unto Charles R. Smith all that lot and parcel of ground situate, lying and being on the west side of Motter Avenue, in Frederick City, Frederick County, State of Maryland, fronting 52 feet on said Motter Avenue, and running back for a depth of 137.8 to a 20-foot alley; said real estate herein conveying and being 52 and 95/100s feet wide in the rear thereof and being all of Lot No. 4 and the southern half of Lot No. 5, as shown and indicated on the revised plat made by Emory C. Crum, civil engineer, for Alice H. Nallin and Ella K. Cramer, recorded in Plat Book EGH No. 2, Folio 28, one of the Land Records of Frederick County, Maryland. The southern half of Lot No. 5 is improved by the two-story brick dwelling house. This Deed was inadvertently not recorded.

SECOND: That on the same date, May 5, 1972, the said Charles R. Smith, did hereby grant and convey unto Clarence A. Welty, Sr., and Mildred M. Welty, his wife, as tenants by the entirety, in fee simple, that same parcel of ground. This Deed was recorded in Book 877, page 516, one of the Land Records of Frederick County, Maryland, on May 19, 1972.