

DON D. CAMERON, JR. * IN THE CIRCUIT COURT
 vs. * FOR FREDERICK COUNTY,
 AFRICAN METHODIST EPISCOPAL * MARYLAND
 CHURCH OF KNOXVILLE, et al * EQUITY NO. 29,276

* * * * *

STATEMENT OF FACTS AND ISSUES

1. Don Davis Cameron, Jr., Plaintiff, purchased property in Knoxville (Frederick County), Maryland on October 10, 1975 from Thomas John Campbell and Sandra Faye Campbell. (Liber 971, folio 429)

2. A purchase money mortgage in the amount of \$26,800.00 was given at settlement to First Federal Savings and Loan Association. (Liber 971, folio 431)

3. The only legal description for the property in question is: "Lot 25 and 26 in Section 17 on the Plat of Part of Weverton."

4. No Plat (or Plan) of Part of Weverton is recorded among the Land Records of Frederick County.

5. Within the last several years (probably in 1977) an old Plat entitled "Plan of Part of Weverton" was left temporarily at the Washington County Court House; a microfiche was made of the original by court house personnel and the original returned to the Washington County Library (rare documents).

6. An adjacent property is owned by Louis Pace Stephens, Jr. and his wife, Nina Faye Stephens by virtue of deed dated June 26, 1973. The legal description of this property includes metes and bounds.

7. Another adjacent property is owned by the African Methodist Episcopal Church by virtue of a deed dated October 15, 1883 and recorded at Liber A.F. 7, folio 513.

8. The only legal description for the church property is "Lot 18 and 19 in Section 13 of the Plat of Part of Weverton".

9. The church was apparently out of title to the property for the period July 11, 1959 to June 22, 1960 by virtue of deed dated July 11, 1959 and recorded at Liber 621, folio 459; title was later re-acquired by deed dated June 22, 1960 and recorded at Liber 643, folio 309.

10. The church claims the right of vehicular ingress and egress to their