

HOWARD G. WOLFE, and
CHARLOTTE R. WOLFE, his wife

VS.

The unknown Heirs, Devises,
Personal Representatives,
Decedants, or Successors
in interest of IGNATIUS SWOPE,
deceased

* NO. 28,974 EQUITY IN
* THE CIRCUIT COURT
* FOR FREDERICK COUNTY
* MARYLAND
*
*
*

BILL OF COMPLAINT TO QUIET TITLE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Howard G. Wolfe and Charlotte R. Wolfe, his wife, by David H. Yinger, Jr., their attorney, respectfully represents unto your Honors:

FIRST: That your Complainants are the owners of a tract or parcel of land, situate, lying and being in Hauvers Election District, Frederick County, Maryland, said property being all that lot or parcel of land containing sixteen acres, more or less, lying about three miles North of Wolfesville, along Wolfe's Road between the Garfield Road and the Pleasant Valley road, adjoining the lands of Nellie Wolfe, Pearl Smith, Ethel Kuhn and others, and being all the same tract of land described in the deed from Christian Lowman and wife, to Ignatius Swope, by deed dated June 1, 1883, and recorded in Liber A.F. No. 7, folio 287 among the Land Records of Frederick County, Maryland, together with the improvements thereon and all rights, ways, and easements thereto belonging or appertaining, hereinafter called "subject real estate".

SECOND: That your Complainants are in constructive and peaceable possession of subject real estate which is now unoccupied.

THIRD: That your Complainants acquired subject real estate from Leroy Cline and Orpha M. Cline by deed dated January 18, 1979 and recorded among the Land Records of Frederick County, Maryland. A copy of said deed is attached hereto as a part hereof and marked Exhibit I.