

surveyed by Rothenhoefer Engineers, Inc., a copy of said Plat is attached hereto and prayed to be taken as a part hereof, marked Exhibit "D" and shaded in green.

THIRD: That said tract or parcel of land described in Exhibit "A" and which is the subject of these proceedings, as outlined in red and blue are the southern part of the 40 foot road as set forth on Exhibit "A" and Exhibit "D" which is west of the Defendants' lots. That the said Defendants, Marcus Ingle and Genevieve Ingle, his wife, Jon B. Pees and Dianne Pees, his wife, Richard O'Heren and Lorraine W. O'Heren, his wife, David G. Everhart, Jr., and Marybell Everhart, his wife, William J. Howard, Jr., and Irma M. Howard, his wife, George T. Barthel and Geneva Barthel, his wife, and Robert McCutcheon and Doris McCutcheon, his wife, owned lots or parts of lots which abutt the said 40 foot road as set forth on Exhibit "A".

FOURTH: That said tract or parcel of land described in Exhibit "A" and in Exhibit "D" and which is the subject of these proceedings, is not an existing traveled road. It is grown up with weeds and trees and is not used to gain access to the rear of any lots.

FIFTH: That the said tract or parcel of land described in Exhibits "A" and "D" and which is the subject of these proceedings, is still held by the Braddock Heights Improvement Company of Frederick County, a body corporate of Maryland, which said Corporation has abandoned the same. The Plat as shown in Exhibit "A" does not dedicate any of the roadways as public streets, nor does Frederick County maintain said roadway.

SIXTH: That your Plaintiff, Elizabeth Eckhardt May, by herself and her predecessors in interest has been in the actual, visible, continuous, exclusive, hostile, notorious and adverse possession and control of the property described in Exhibit "A", and surveyed by Rothenhoefer Engineers, Inc., a copy of said Plat and metes and bounds description is attached hereto and prayed as a part hereof, marked Exhibit "D", as outlined in red with full claim of ownership for over a period of twenty (20) years, which is the subject of these proceedings, prior to the filing of this Bill of Complaint.

SEVENTH: That your Plaintiff, Anna May Hughes, by herself and her predecessors in interest has been in the actual, visible, continuous, exclusive, hostile, notorious and adverse possession control of the property described in Exhibit "A" and surveyed by Rothenhoefer Engineers, Inc., a copy of said Plat