

JOHN ROBERT COSHUN, Personal Representative)
of the Estate of)
CARRIE E. COSHUN, deceased)

EQUITY NO. 31,634

Complainant

IN THE CIRCUIT COURT

vs.

FOR

GEORGE ALGER, his Heirs, Personal)
Representative, Decendants or)
Successors in Title, and any and all)
persons claiming an interest therefrom)

FREDERICK COUNTY,
MARYLAND

Respondents

BILL OF COMPLAINT TO QUIET TITLE

Now comes John Robert Coshun, by his attorney, Russell T. Horman, and respectfully represents unto this Honorable Court:

1. That Carrie E. Coshun, late of Frederick County, deceased, and her late husband, John H. Coshun, were fee simple owners of record, as tenants by the entireties, of a tract of land situate, lying and being in the Village of Ladiesburg, Frederick County, Maryland, on the south side of Maryland Route 194, better known as Woodsboro Pike, and on the east side of the State road leading from New Midway to Keymar, better known as Warner Road, in Johnsville Election District, Frederick County, Maryland, and being more fully described in a deed dated the 6th day of March, 1951, and recorded among the Land Records of Frederick County, in Liber 491, folio 155, a copy of which is attached hereto and marked "Exhibit 1"; the said John N. Coshun having died on or about the 15th day of June, 1962, vesting absolute title in Carrie E. Coshun, his wife, as surviving tenant by the entirety, and the said Carrie E. Coshun, having died on or about February 5, 1981, vesting title to said property in her duly qualified Personal Representative, John Robert Coshun.

2. That the Complainant, John Robert Coshun, Personal Representative of the estate of Carrie E. Coshun, late of Frederick County, Maryland, deceased, was designated as Executor, hereinafter referred to as "Personal Representa-