

DONALD M. MANAHAN	*	NO. <u>34028</u>	EQUITY
Drawer A			
Sabillasville, Maryland 21780	*	IN THE	
VS.	*	CIRCUIT COURT	
HOWARD E. COX, Executor of the	*	FOR	
Estate of AGNES E. MEYER			
12 East 41st Street	*	FREDERICK COUNTY	
New York, New York, 10017	*		
	*		
and	*		
	*		
THE UNKNOWN HEIRS, DEVISEES OR	*		
	*		
PERSONAL REPRESENTATIVES OF	*		
	*		
ETHEL M. MEYER, JAMES W. MEYER and	*		
	*		
JOHN M. WATSON	*		

* * * * *

BILL OF COMPLAINT TO QUIET TITLE

Donald M. Manahan, Plaintiff, by Herbert L. Rollins and Rollins, Price and Tisdale, his attorneys, alleges:

1. Plaintiff is in actual peaceable possession of two parcels of real estate located in Hauvers Election District, Frederick County, Maryland, containing respectively seven (7) acres more or less and four (4) acres and 100 square perches more or less. The two parcels (hereinafter called "the subject real estate") were conveyed to the Plaintiff from Francis M. Manahan and Nellie M. Manahan, his wife, by deed dated June 10, 1972, and recorded in Book 879, page 582, one of the Land Records of Frederick County. A certified copy of this deed is filed herewith as Exhibit 1.

2. Nellie M. Manahan, who reserved a life estate in the subject real estate is now deceased. Francis M. Manahan, who also reserved a life estate, is now ill and disabled. By power of attorney dated January 16, 1973, and recorded in Book 900, page 313, one of the said Land Records, he has authorized Plaintiff to deal with, encumber, let, sell or convey his interest in the subject real estate. A certified copy of the power