

MAMIE IONA HUTZELL  
220 South Main Street  
Boonsboro, Maryland 21713

COMPLAINANT

VS.

THE UNKNOWN HEIRS, DEVISEES,  
PERSONAL REPRESENTATIVES, DESCENDANTS  
OR SUCCESSORS IN INTEREST OF HENRY FORD

DEFENDANTS

\* NO. 34099 EQUITY  
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\*  
\* IN THE  
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\*  
\* CIRCUIT COURT  
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\*  
\* FOR FREDERICK COUNTY,  
\*  
\*  
\* MARYLAND  
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\* \* \* \* \*

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Mamie Iona Hutzell, Complainant by Ralph L. Gastley, Jr., her solicitor, respectfully represents unto your Honorable Court:

FIRST: That your Complainant herein is the owner of approximately 1.22 acres of land, more or less, a portion of which is set forth in a Deed from Lawson C. Alexander to Leroy Cleveland Hutzell and Mamie Iona Hutzell, his wife, (the said Leroy Cleveland Hutzell having predeceased the said Mamie Iona Hutzell) dated January 23, 1956 and recorded in Liber 558, Folio 366, one of the Land Records of Frederick County, Maryland, a certified copy of said Deed is attached hereto and marked "Exhibit 1" and prayed to be made a part hereof.

SECOND: That the said Lawrence C. Alexander, widower, obtained said property with his wife, Sandy F. Alexander from Edgar L. Sheffer and wife by Deed dated March 18, 1942 and recorded in Liber 433, Folio 491, one of the aforesaid Land Records, a certified copy of said Deed is attached hereto and marked "Exhibit 2" and prayed to be made a part hereof.

THIRD: That the said Edgar L. Sheffer and wife obtained said property from Clyde C. Koogle and Bessie E. Koogle, his wife, by Deed dated December 11, 1940 and recorded in Liber 426, Folio 296, one of the aforesaid Land Records, a certified copy of said Deed is attached hereto and marked "Exhibit 3" and prayed to be made a part hereof.

FOURTH: That the portion in said Deed known as Parcel 2 being the subject of these proceedings and it being a portion of the property conveyed from Joshua Flook to Henry Ford, containing 4 acres 1 rood and 22 square perches of land which is Parcel 2 in the aforesaid Deed recorded in Liber 426, Folio 296, being Exhibit 3, which has excepted from said parcel 3 1/6 acres as more