

CLYDE COCKERHAM	:	IN THE
FRANCENE COCKERHAM	:	
	:	CIRCUIT COURT
Plaintiff	:	
	:	FOR
VS.	:	
	:	FREDERICK COUNTY, MARYLAND
ALL PERSONS HAVING OR CLAIMING:	:	
TO HAVE ANY INTEREST IN THE	:	CIVIL NO. <i>27771 Civil</i>
PROPERTY HEREIN DESCRIBED	:	
	:	
Defendant	:	

COMPLAINT TO QUIET TITLE

Plaintiffs, Clyde Cockerham and Francene Cockerham, by their attorney, Tod P. Salisbury, states that:

(1) Plaintiffs are adult citizens of the United States who reside in Frederick County, Maryland, and are the fee simple owners of a parcel of land at 10002 Baltimore National Pike, Myersville, Maryland in Jackson Election District, Frederick County, Maryland, by virtue of a Deed dated December 29, 1986, from Eva V. Schroyer recorded among the Land Records of Frederick County, Maryland, in Liber 1387, folio 512.

(2) A copy of which Deed is attached hereto marked Exhibit A and incorporated herein by reference.

(3) Possession of said subject property by plaintiffs and their predecessors in title has been actual, open, notorious, and visible, exclusive hostile, and continuous for a period in excess of 20 years prior to the filing of this Complaint.

(4) That attached hereto as Exhibit B and incorporated herein by reference is the Affidavit of Eva V. Schroyer who owned said property from March 16, 1951 until December 29, 1986.

(5) That attached hereto as Exhibit C and incorporated herein by referenced is a deed from William M. Bittle and Catherine Bittle to Charles C. Grossnickle and Peter Grossnickle dated April 1, 1903 recorded in Liber 265, folio 47 which includes the property which is the subject of this proceeding.

(6) That attached hereto as Exhibit D and incorporated herein by reference is the Will of Peter Grossnickle which provides that his interest in said property may be purchased from his estate by Charles C. Grossnickle provided he elected to do so but that the records of the Frederick County Register of Wills contain no such election and Charles C. Grossnickle later conveyed his interest to Plaintiff's predecessors in title.