

COMPLAINT TO QUIET TITLE AND/OR FOR ADVERSE POSSESSION

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Clayton J. Thomas and Gertrude V. Thomas, Plaintiffs, by Lawrence E. Heffner, Jr., their attorneys respectfully state as follows:

1. That the Plaintiffs, Clayton J. Thomas and Gertrude V. Thomas, are the record owners of two parcels of real estate lying and being in Frederick County, Maryland, in the Town of Brunswick, and each being more particularly described as Lots No. 10 and 11, in Block No. 21, as shown on a plat of the Mutual Land and Improvement Company of Baltimore City, which said plat is recorded along with a deed from Thomas J. Cannon and wife to the said Mutual Land and Improvement Company of Baltimore City, in Liber W.I.P. 11, Folio 473, among the Land Records of Frederick County, Maryland (hereinafter referred to as the "Plat"). That a copy of said Plat is being attached hereto as Plaintiffs Exhibit A and prayed to be made a part hereof.

2. That the two parcels of real estate designated as Lots No. 10 and 11, in Block No. 21, as shown on the aforementioned Plat, are all and the same real estate conveyed unto the Plaintiffs herein by Jessie Brown, unmarried, and Betty Kelley, divorced, by deed dated April 3, 1964, and recorded in Liber 701, folio 353, among the Land Records of Frederick County, Maryland. A copy of the aforesaid deed is attached hereto as Plaintiffs Exhibit B and prayed to be made a part hereof.

3. That upon purchase of the aforementioned parcels of real