

No. 5913 Equity.

The Real Estate and Improvement
Company of Baltimore City, a body
Corporate of the State of Maryland

In the Circuit Court
for Frederick County
in Equity.

Mrs. Ida L. Woolford widow and
Ida May Woolford Daisy Ella
Woolford. Grace B. Woolford
William Hamilton Woolford
Charles Hyde Woolford and
Oliver Benjamin Woolford, Children
and heirs at Law of Charles Woolford
decd. and A. C. Potter

To the Honorable the Judges of the Circuit Court
for Frederick County sitting as a Court of Equity
The Bill of Complaint of the Real Estate and Improvement
Company of Baltimore City, a Corporation of the State of Mary-
land respectfully shews to your Honors,
1. That your Complainant is the owner of a large body
of land situate in Potomac District Frederick County,
which your Complainant has subdivided into Lots which
now constitute the town of Brunswick in said District in
Frederick County Maryland, the subdivision and plats for
the same being duly recorded among the Land Records
of Frederick County, and that prior to the tenth day of October
in the year Eighteen hundred and ninety one, said Complainant
sold to a certain Charles Woolford, Lot Number 10th in Block
Number Eight, being a piece or parcel of ground situate in the
town of Brunswick Frederick County State of Maryland, for
the sum of two hundred dollars, the sum of thirty five dollars
being paid in Cash, and the residue to be received by the
mortgage of the said Charles Woolford and Ida L. Woolford
his wife to your Complainant, upon the Execution and
delivery of a Deed to the said Woolford from your Complainant.
2. That in pursuance of the Contract of sale of said Lot
of Ground, your Complainant on the tenth day of October
1891, executed a Deed for said Lot of Ground and had
prepared a mortgage from the said Woolford and wife
to secure the balance of the purchase money, but which
said deed never was delivered, or said mortgage Execu-
ted as will be fully stated hereafter, and your Complainant
Exhibits said deed and mortgage as part of this its Bill of Complaint,
showing a full description of the Lot of Ground thus sold to the
said Woolford and the terms of its Contract Marked Exhibits
A. B. which are hereby prayed to be taken and considered as
part of its Bill of Complaint.