

Bill of Complaint

No. 7047 Equity

and warning them and each of them to appear in this Court, in person or by Solicitor on or before a certain day, to be named therein, to show cause, if any they have, why a decree ought not to pass as prayed; and also the writ of Subpoena directed to the said Jas. A. DeFoye and Catherine DeFoye his wife, both of whom reside in Baltimore City, in the State of Maryland, commanding them and each of them to be and appear either in person or by Solicitor, in this Court, on or before a certain day to be named therein, to show cause, if any they have, why a decree ought not to be prayed and passed.

And as in duty bound, etc.

Vincent Debold

Solicitor for Plaintiff.

State of Maryland, Frederick County, To-wit:

I hereby certify that on this 19 day of June, 1899, before me, the Clerk of the Circuit Court for Frederick County, personally appeared James M. Kerrigan and made oath in due form of law that the matters and things set forth in the foregoing bill of complaint are true as therein stated to the best of his knowledge and belief.

Test: Douglas H. Hargrett, Clerk.

Filed June 19, 1899.

"Exhibit A."

At the Request of Mary A. J. Kerrigan the following Deed is Recorded Aug. 14th 1880.

Test: Adolphus Fearhake Jr. Clerk.

This Deed, made this twenty eighth day of July in the year Eighteen Hundred and eighty by Frederick H. Kerrigan of Frederick County, in the State of Maryland, Witnesseth, that in consideration of Five Hundred Dollars, the receipt of which is hereby acknowledged, doth grant unto Mary A. J. Kerrigan of the County and State aforesaid, all that lot or parcel of ground lying and being in the town of Emmetsburg, being the eastern portion of Lot No. 6 beginning at the alley between lot No. 5 and lot No. 6, measuring thirty feet from said alley westwardly on the front side of the said lot, thence by a line at right angle direct through to interest, and alley on the north side of said lot, thence with said alley Easterly to the aforesaid alley between lots No. 5 and lot 6 to the first starting point, it being the same lot of ground that was conveyed to the said Frederick H. Kerrigan by Mary A. J. Kerrigan by Deed, dated on the fifth day of February, in the 1879, and recorded in Liber T. G. No. 11 folios 75 vs. one of the Land Records of Frederick County, in fee simple.

Witness my hand and seal,

Frederick H. Kerrigan (seal)

Witness, Henry Stokes,

State of Maryland, Frederick County, To-wit:

I hereby certify that the foregoing is a true copy of the Original Deed as the same is Recorded in Liber A. F. No. 2 folio 268 one of the Land Records of Frederick County.

In testimony whereof I hereto subscribe my name and affix the seal of the Circuit Court for Frederick County, this 19th day of June A. D. 1899.



Douglas H. Hargrett,

Clerk of the Circuit Court for Frederick County.