No. 8761. Equity

Bill of Complaint.

Filed Oct. 16-1911.

Caroline Johnson and J. Harry Johnson and Fannie Zimmerman,

vs.

Fannie Zimmerman, Annie Reich, Nellie See Robin, George Zimmerman and Angeline Zimmerman, his wife, and Harry Zimmerman and Beulah B. Zimmerman his wife; Harry C. Trikapee, Tenant, Edward T. Baumgardner and Emma S. Baumgardner his wife and Frederick R. a body Corporate of the State of Maryland.

In the Circuit Court for Frederick County, Sitting as a Court of Equity

To the Honorable Judges of Said Court:—

The Bill of Complaint of Caroline Johnson and J. Harry Johnson, her husband, and Fannie Zimmerman, respectfully shows unto Your Honors:—

1. That they are residents of Frederick City, Frederick County, Maryland; and George Zimmerman and Angeline Zimmerman his wife, and Harry Zimmerman and Beulah B. Zimmerman, his wife, are residents of the State of Ohio, and Non-residents of the State of Maryland; and Annie Reich is a resident of the State of Connecticut and a non resident of the State of Maryland; and the Said Frederick Rail-road Company is a Corporation Chartered under the laws of Maryland, doing business in Frederick County, and have its principal office in Frederick City, Maryland.

2. That the Said Caroline Johnson (whose maiden name was Caroline Zimmerman, and who at the time the Deed hereinafter mentioned was executed, was unmarried) and Fannie Zimmerman are Seized and possessed in fee-simple of an undivided two-Sevenths interest in all that tract of land containing fifty-eight acres and Thirteen Square Perches of land more or less, Situated immediately West of the Normans' College Property, heretofore known as Gregg Park, near the Western Limits of Frederick City, in Frederick County, Maryland.

3. That the Said Caroline Johnston and Fannie Zimmerman acquired their interest in Said real estate under a Deed executed by William C. Pirely and Laura V. Pirely, his wife, to the Said Plaintiffs, Caroline Johnston and Fanie Zimmerman, and the Said Defendants, Fannie Zimmerman, Annie Reich, Nellie See Robin, George Zimmerman and Harry Zimmerman, dated Oct 7. 1909, and recorded in Liber S.T.H. No. 289, folio 248, one of the Land Records of Frederick County, a certified copy of which Said Deed is herewith filed