

BILL OF COMPLAINT

Helen Norris Flagg and Joseph D. Flagg, her husband,	"	No. 13883 Equity
vs.	"	In the Circuit Court for Frederick County.
Josie Windsor Simpson and F. Loraine Simpson, her husband, Carrie Norris McKinney and Charles William Smith	"	In Equity.

To the Honorable the Judges of said Court:

The Bill of Complaint of Helen Norris Flagg and Joseph D. Flagg, her husband, respectfully shows unto your Honors:

First: That Nicholas E. Norris, late of Frederick County, died on or about the 15th day of March, 1924, leaving a last Will and Testament dated July 30, 1920, and recorded among the Will Records of Frederick County in Liber G. E. S. No. 1, Folio 315, a certified copy of which is filed herewith as a part hereof marked Exhibit No. 1, wherein he gave and devised his estate in equal portions unto the following children: Josie Simpson, Edna Optenberg, N. Browning Norris, Carrie Norris McKinney, Helen N. Flagg, S. McKinstry Norris, Paul U. Norris, and Charles William Smith and Paul Urner Smith, children of Mary E. Smith, a deceased daughter.

Second: That the said Nicholas E. Norris died seized and possessed of all that tract or parcel of real estate situate, lying and being in Johnsville District, in Frederick County, Maryland, which was conveyed unto the said Nicholas E. Norris by Mary Ann Norris, et al, heirs at law of Nicholas Norris, Sr., by deed dated June 21, 1882, and recorded in Liber A. F. No. 5, Folio 395, one of the Land Records of Frederick County, containing 200 acres, 3 roods and 28 square perches of land, more or less, a certified copy of which is filed herewith as a part hereof and marked Exhibit No. 2, and a small parcel of land containing 1 acre and 64 square perches, which was conveyed unto the said Nicholas E. Norris by Nicholas H. Clemson and wife by deed dated February 12, 1887, and recorded in Liber W. I. P. No. 13, Folio 81, one of the Land Records of Frederick County, a certified copy of which is filed herewith as a part hereof and marked Exhibit No. 3, saving and excepting, however, all the following parcels of real estate which have been conveyed out of the aforementioned total area:

(1) All that real estate which was conveyed by Nicholas E. Norris to the Keys Chapel of the Methodist Episcopal Church, containing 85½ square perches, by deed dated May 11, 1883, and recorded in Liber A. F. No. 7, Folio 314, one of the Land Records of Frederick County, a certified copy of which is filed herewith as a part hereof and marked Exhibit No. 4.

(2) All that tract or parcel of land which was conveyed by the said Nicholas E. Norris to William H. Hill, containing 76.81 square perches, by deed dated August 6, 1884, and recorded in Liber A. F. No. 9, Folio 359, one of the Land Records of Frederick County, a certified copy of which is filed herewith as a part hereof and marked Exhibit No. 5.

(3) All that tract or parcel of land which was conveyed by Nicholas E. Norris and wife to Summerfield Bigers, containing 111 square perches, more or less, by deed dated April 18, 1885, and recorded in Liber A. F. No. 11, Folio 216, one of the Land Records of Frederick County, a certified copy of which is filed herewith as a part hereof and marked Exhibit No. 6.

(4) All that tract or parcel of land which was conveyed by Nicholas E. Norris and wife to Henry Fisher, containing 76 square perches, more or less, by deed dated March 5, 1886, and recorded in Liber W. I. P. No. 1, Folio 345, one of the Land Records of Frederick County, a certified copy of which is filed herewith as a part hereof and marked Exhibit No. 7.

(5) All that tract or parcel of land which was conveyed by Nicholas E. Norris and wife to John H. Key, containing 83 square perches, more or less, by deed dated April 30, 1886, and recorded in Liber W. I. P. No. 1, Folio 428, one of the Land Records of Frederick County, a