

BILL OF COMPLAINT

ALBERT E. CAVELL

"

No. 15445 EQUITY

VS.

"

IN THE CIRCUIT COURT FOR

JESSIE M. SIMMONS,
JAMES H. FALK, County Treasurer
for Frederick County, Maryland

"

FREDERICK COUNTY, MARYLAND

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Albert E. Cavell, respectfully shows:

1. That on the 10th day of April, A.D. 1944, James H. Falk, County Treasurer of Frederick County, Maryland and Collector of Taxes for the State of Maryland and for Frederick County, Maryland, sold to Samuel C. Jones, at public auction for the sum of One Hundred and Forty Dollars (\$140.00), the property located in Urbana District described as thirty-eight acres (38) of wood land, more or less, and assessed to Jessie M. Simmons, on account of State and County taxes then due and in arrears.

2. That on the 10th day of April, 1944, the said Samuel C. Jones paid to the said James H. Falk, County Treasurer of Frederick County, Maryland, the said sum of One Hundred and Forty Dollars (\$140.00) as appears by the Certificate of Sale signed by the said James H. Falk, County Treasurer of Frederick County, Maryland, and dated the 10th day of April, 1944, and issued to the said Samuel C. Jones on said date. The said Certificate of Sale is filed herewith marked "Plaintiff's Exhibit No. 1" and prayed to be considered as part hereof.

3. That the said Samuel C. Jones died on or about the third day of November, 1944, in Montgomery County, Maryland, and Letters of Administration were granted to James H. Pugh, Esq., who has duly qualified as Administrator of the estate of the said Samuel C. Jones, deceased.

4. That on the 22nd day of May, 1945, the said James H. Pugh, Esq., Administrator of the estate of Samuel C. Jones, deceased, assigned all the right, title and interest in and to the said Certificate of Sale unto your Orator, as will appear on the said Certificate of Sale.

5. That the said property hereinabove referred to has not been redeemed by any party in interest, although more than one year from the date of sale on April 10, 1944, has expired.

6. That there is filed herewith a statement signed by James H. Falk, County Treasurer of Frederick County, Maryland, showing the amount necessary for the redemption of the said property, which said statement is marked "Plaintiff's Exhibit No. 2" and prayed to be considered as part hereof.

TO THE END THEREFORE:

1. That a final Decree may be passed by your Honorable Court foreclosing all rights of redemption of the Defendants herein in and to the property herein referred to, and that the County Treasurer of Frederick County, Maryland, be directed to prepare and execute a Deed, in fee simple, to Albert E. Cavell, the Plaintiff herein, upon payment of the purchase price of the property in full, together with all taxes, interest, and penalties thereon accruing subsequent to the date of sale.

2. That your Orator may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Order of Publication giving notice to the said Jessie M. Simmons, of Washington, District of Columbia, who is a non-resident of this State, and to all persons having or claiming to have any interest in property located in Urbana District described as thirty-eight acres (38) of wood land, more or less, of the object and substance of this proceeding, and warning them to be and appear in this Court, in person or by Solicitor, on or before a certain day, to be names therein, not less than sixty days from the time of the filing of this Bill of Complaint, and answer said Bill