BILL OF COMPLAINT

Edward P. Oden and Edna E. Oden, his wife, and Russell H. Oden and Blanche Oden, his wife,	:	No. 16235 Equity
	:	In the Circuit Court
vs.	:	For Frederick County,
	:	Maryland.
John J. Schmidt and Adelle B. Schmidt, his wife, Mary Borden Wallace Lee and E. Lawrence Lee, Jr., her husband, and Nancy Wallace Henderson, widow, and Aubrey A. Nicodemus, unmarried,	:	In Equity.
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TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Edward P. Oden and Edna E. Oden, his wife, and Russell H. Oden and Blanche Oden, his wife, Complainants, by their Solicitor, Sherman P. Bowers, respectfully shows:

1. That they are the owners, in fee simple, of all those four lots or parcels of ground situate, lying and being in Frederick City, Frederick County, Maryland,

Being known and designated as Lots Nos. 3, 4, 5, and 6, in Section B, as designated on a plat of the D. H. Buckey property, recorded in Plat Book E.G.H. No. 2, folio 10, one of the Land Records of Frederick County aforesaid, and beginning for the same at a point in the southern line of Frederick Avenue 350 feet eastwardly from the intersection of the southern line of Frederick Avenue with the eastern line of Neidig Avenue, and running thence southwardly parallel to Neidig Avenue 125 feet to an alley; thence westwardly parallel to Frederick Avenue 100 feet to a point; thence northwardly parallel to Neidig Avenue 125 feet to the south line of Frederick Avenue, thence with the southern line of Frederick Avenue eastwardly 100 feet to the place of beginning.

And being a part of the property more particularly described in a deed from Daniel H. Buckey and Rachel A. Buckey, his wife, to Olver T. Wallace, dated August 7, 1927, and recorded in Liber No. 364, folio 41, one of the Land Records of Frederick County,
a certified copy of which said deed is filed herewith as a part hereof and marked Exhibit "A".

2. That on or about the 27th day of September, 1927, John J. Schmidt and Adelle B. Schmidt, his wife, purchased at public sale from the said Oliver T. Wallace and Mary Borden Wallace, his wife, the aforesaid four lots of ground and received from the said Oliver T. Wallace and Mary Borden Wallace, his wife, a deed therefor; that the said John J. Schmidt and Adelle B. Schmidt, his wife, immediately entered into possession of the aforesaid four lots of ground, but that the said John J. Schmidt and Adelle B. Schmidt, his wife, failed and neglected to record the aforesaid deed and that the said deed has been lost, mislaid or destroyed and cannot now be located; that the said John J. Schmidt and Adelle B. Schmidt, his wife, continued in possession of said four lots of ground from the time of their purchase as aforesaid until the said John J. Schmidt and Adelle B. Schmidt, his wife, conveyed said four lots of ground unto Aubrey A. Nicodemus by deed dated October 6, 1944, and recorded in Liber No. 444, folio 265, one of the Land Records of Frederick County; that the said Aubrey A. Nicodemus continued in possession of said four lots of ground until he reconveyed said lots of ground unto the said John J. Schmidt and Adelle B. Schmidt, his wife, by deed dated October 6, 1944, and recorded in Liber No. 449, folio 370, one of the Land Records of the County aforesaid; that thereafter the said John J. Schmidt and Adelle B. Schmidt, his wife, held title to said lots in fee simple and physical possession thereof until July 31, 1946, when the said John J. Schmidt and Adelle B. Schmidt, his wife, conveyed said four lots of ground unto Edward P. Oden and Edna E. Oden, his wife, Russell H. Oden and Blanche