

"BILL OF COMPLAINT"

Thomas and Company, a body corporate,	:	No. <u>13771</u> Equity.
	:	
Vs.	:	In the Circuit Court for
	:	Frederick County, sitting
Clarence A. Bussard, Raymond H. Bussard, and Mary C. Wilhide.	:	as a Court of Equity.
	:	
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TO THE HONORABLE THE JUDGES OF SAID COURT:

The Bill of Complaint of Thomas and Company, a body corporate of the State of Maryland, doing business in Frederick County, Maryland, respectfully shows unto your Honors:

(1) That your Complainant is a duly incorporated body of the State of Maryland and conducts within the State the business of packing and canning vegetables and selling canned goods, and having its principal place of business in Frederick County, Maryland; and the defendants, Clarence A. Bussard and Raymond H. Bussard, are adults and residents of Frederick County, Maryland, and Mary C. Wilhide is an adult and resident of Baltimore County, Maryland.

(2) That the Complainant is seized and possessed of a piece of real estate situated on the North side of East South Street in Frederick City, Frederick County, Maryland, bordering on East South Street a distance of forty feet and running back an even width a distance of 273.5 feet, and for the whole of said distance bordering on a twenty foot alley, hereinafter mentioned and described, the said real estate having been conveyed unto Thomas and Company by James H. Gambrill Jr. et al. by deed dated August 16, 1912, and recorded in Liber H.W.B. No. 302, folio 67, one of the Land Records of Frederick County, saving and excepting, however, all that real estate which was conveyed by Thomas and Company unto Thomas and Company, Inc., by deed dated the 28th day of March, 1931, and recorded in Liber No. 378, folio 215, one of the Land Records of Frederick County, certified copies of which said deeds are filed herewith as a part hereof marked Exhibits Nos. 1 and 2, the afore-