

James L. O'Connor, unmarried	:	No. <u>19,304</u>	Equity
Complainant	:		
	:	In the Circuit Court for	
v.	:		
	:	Frederick County, Maryland	
John F. O'Connor and Patricia	:		
O'Connor, his wife; Mary M.	:	Sitting as a Court of	
O'Connor, unmarried; Beulah	:		
M. DeWees, widow	:	Equity	

: : ; : : :

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of James L. O'Connor, by Stewart Hobbs Brown, his Solicitor, respectfully represents unto your Honors:

First: That by a deed from Agnes Fogle and Eugene Fogle, her husband, dated March 10th, 1910, and recorded in Liber H. W. B. No. 292, Folio 265, one of the Land Records of Frederick County, Maryland, they ". . . , do hereby grant and convey in fee simple unto Thomas O'Connor and Anna M. O'Connor, of Frederick County, Maryland, ((as joint tenants in common", a lot or parcel of land one mile north east of Thurmont in Frederick County, Maryland; a copy of which is attached hereto, Marked "Exhibit Deed", and prayed to be taken as a part hereof, as well as any and all other papers attached hereto.

Second: That Anna M. O'Connor died intestate on or about the 5th day of October, 1912, survived by her husband, Thomas O'Connor, and the following children, to-wit: a son, James L. O'Connor, unmarried; ^{a son,} John F. O'Connor, whose wife's name is Patricia; a daughter, Mary M. O'Connor, unmarried; a daughter, Beulah M. O'Connor (who intermarried with one DeWees, now deceased) DeWees, widow.

Third: That Thomas O'Connor departed this life on or about the 16th day of May, 1940, testate, and, by his last Will and Testament dated March 27, 1929, probated June 3, 1940, and admitted to record in Liber R.L.L. No. 1, Folio 5, one of the Will Records of Frederick County, Maryland; a copy of which is attached hereto, Marked "Exhibit Will", and prayed to be taken as a part hereof, provided as follows: "First: I give and devise unto my son, James L. O'Connor, all of the Real Estate of which I may die seized and possessed, to be his absolutely."

Fourth: That James L. O'Connor has been in actual, peaceable, open, notorious and exclusive possession of the^a aforementioned property since, 1940, under and by virtue of the aforesaid Will of Thomas O'Connor, maintaining the property; paying the insurance and taxes thereon.

Stewart Hobbs Brown
Attorney at Law
Frederick,
Maryland