

LIBRA 22 na 661

NO. 20386 EQUITY
IN THE CIRCUIT COURT FOR FREDERICK
COUNTY, MARYLAND

RICHARD E. SUMMERS, R.F.D. #5, Frederick, Maryland, and JOHN A. SUMMERS, R.F.D. #5, Frederick, Maryland, EXECUTORS OF THE ESTATE OF GRACE R. B. SUMMERS, late of Frederick County, Deceased,
COMPLAINANTS,

vs.

JOHN D. WHITE and IRENE G. WHITE, his wife, 300 Upper College Tr., Frederick, Maryland, and
JOHN B. FUNK, Chairman, PAUL J. BAILEY, HARLEY P. BRINSFIELD, WILLIAM B. OWINGS, LANSDALE G. CLAGGETT, THOMAS N. KAY AND JOHN J. MCMULLEN, being the STATE ROADS COMMISSION OF MARYLAND, acting for and on behalf of the State of Maryland, State Office Building, West Preston Street, Baltimore, Maryland,
DEFENDANTS

PETITION

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Richard E. Summers and John A. Summers, Executors of the Estate of Grace R. B. Summers, late of Frederick County, deceased, by Edward D. Storm, their Solicitor, respectfully represent:

1. That this Petition is brought under the provisions of the Uniform Declaratory Judgments Act, being Article 31A of the Annotated Code of Maryland.

2. That your Petitioners are the duly appointed and qualified Executors of the Last Will and Testament of Grace R. B. Summers, deceased, and as such they entered into a contract for the sale of said decedent's real estate located along U.S. Route Alternate 80, being also known as the road to Old Braddock, and a copy of said contract is filed herewith as Exhibit "A" and prayed to be taken as part hereof.

3. That the Defendants John D. White and Irene G. White, his wife, are the contract-purchasers of said real estate under Exhibit "A".

4. That the Orphans' Court for Frederick County having approved said sale and your Petitioners being in possession and having, as they believe, good title, they have requested the Defendants White to fulfill their obligations under said contract and complete the transaction.

5. That prior to closing said transaction, the Defendants White had a survey and title search made and all appears clear and satisfactory except for the fact that two Plats, being numbers 8937 and 8938, are in file among the Maryland State Roads Commission

EDWARD D. STORM
ATTORNEY AT LAW
FREDERICK, MARYLAND