

RICHARD E. SUMMERS, ET AL, : IN THE
Complainants :
vs. : CIRCUIT COURT
JOHN D. WHITE, ET AL, : FOR
Defendants : FREDERICK COUNTY
: No. 20,385 Equity

ANSWER

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The State Roads Commission of Maryland, by Thomas B. Finan, Attorney General, Joseph D. Buscher, Special Assistant Attorney General, and Charles C. Grice, Special Attorney, respectfully says for an answer to the Bill of Complaint filed herein:

1. That it admits the matters and things set forth in paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, and 11 of the Bill of Complaint in so far as it has knowledge of same.

2. That by Chapter 51 of the Acts of 1804 a Charter was issued to the Turnpike Company to lay out a road from Baltimore City to Boonsboro with a width of 66 feet and to construct a stone road at least 18 feet wide on same.

3. That said road was laid out with a 66 foot width and rights of way to that width secured throughout its length.

4. That December 21, 1910 the Turnpike Company conveyed all of its rights, title and interest in and to said turnpike unto the State Roads Commission of Maryland, deed for which is recorded among the Land Records of Frederick County in Liber H.W.B. 29^h, folio 361.

5. That it submits to the jurisdiction of this Honorable Court.

Having fully answered the Bill of Complaint, it begs to be dismissed hence with its proper costs.

AND AS IN DUTY BOUND, ETC.

Thomas B. Finan
Attorney General Thomas B. Finan
Joseph D. Buscher
Special Asst. Attorney General
Joseph D. Buscher
Charles C. Grice
Special Attorney
Charles C. Grice