CARRIE S. BARTLETT and ELMER C. BARTLETT R. F. D. #4 Frederick, Maryland	:	NO. 20467 EQUITY
	:	IN THE CIRCUIT COURT
VS.	:	
	:	FOR FREDERICK COUNTY
PRESTON MICHAEL and ELSIE MEIER MICHAEL, his wife 3732 Howard Road Richmond, Virginia	:	IN EQUITY

: : : :

TO THE HONORABLE, THE JUDGES OF THE CIRCUIT COURT FOR FREDERICK COUNTY, SITTING AS A COURT OF EQUITY:

The Bill of Complaint of Carrie S. Bartlett and Elmer C. Bartlett, her husband, by Richard E. Zimmerman, their Attorney, respectfully shows unto your Honors:

FIRST: That heretofore to-wit on the 30th day of July, 1866, John W. Cook and Charlotte L. Cook, his wife, conveyed unto Samuel Thomas, by deed recorded in Liber J.W.L.C. No. 4, Folio 227, one of the Land Records of Frederick County, certain pieces, parcels or tracts of land situate, lying and being in Frederick County, State of Maryland, being parts of tracts of land called "Boiling Spring", "Mistaken Rival" and "Father's Secure", or by whatsoever other name or names the same may be known or called, containing sixty-eight (68) acres, three (3) roods and thirty-five (35) square perches of land, more or less.

SECOND: That the said Samuel Thomas departed this life, intestate, and a widower in the year 1889, whereupon his interest in the aforesaid real estate descended unto his eight children, as his only heirs at law, namely: George D. Thomas, Bruce V. Thomas, Milton F. Thomas, Bennie R. Thomas, Annie A. Thomas, Lottie V. Thomas, May I. Thomas and Hattie C. Michael, each of said parties being seized and possessed upon his death of a one-eighth interest therein.

THIRD: That Hattie C. Michael, one of the children of the said SamuelThomas, did convey her one-eighth interest in the aforesaid tract of land unto Bruce V. Thomas, another of the children and heir at law of Samuel Thomas, by deed bearing date of April 29, 1920, and recorded in Liber No. 331, Folio 449, one of the Land Records of Frederick County.