

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

DAVID MORGAN JONES

*

vs.

*

NO. 20,616 EQUITY

The known and unknown heirs,
 devisees, personal representatives,
 descendants or successors in interest *
 of the Directors, Officers and Stock-
 holders of THE THOMAS AND EVANS *
 FREDERICK SLATE COMPANY, and
 RICHARD THOMAS and *
 MARGARET THOMAS FRATTO

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of David Morgan Jones, of Frederick County, Maryland, by Mathias, Mathias and Rollins, his solicitors, respectfully represents unto your Honors:

FIRST: That your Complainant is the legal owner of the hereinafter described property and files this Bill of Complaint for the purpose of removing any cloud which might presently affect title to said property and to confirm in him a good and marketable title to the property hereinafter described.

SECOND: That the property to which your Complainant claims fee simple title is more particularly described in a deed from Mary J. Thomas and John M. Thomas, her husband, to The Thomas and Evans Frederick Slate Company, a corporation of Wilmington, Delaware, dated May 1, 1909, and recorded in Liber S.T.H. 286, folio 429, one of the Land Records of Frederick County, Maryland, wherein said property is described by courses and distances, as a tract of land situate, lying and being in Urbana District, Frederick County, Maryland, containing 20 acres, more or less, together with a right-of-way 33 feet in width, as more particularly set out in said deed,