

HENRY W. OWENS

and

CORA G. TAYLOR and CLAUDE H. TAYLOR

her husband

and

WINIFRED E. EUBANKS and

ARTHUR EUBANKS, her husband

vs.

THE UNKNOWN HEIRS, DEVISEES, PERSONAL
REPRESENTATIVES, DESCENDANTS OR SUCCESSORS
IN INTEREST, OF SARAH BROOKS, DECEASED.

NO. 20,916 EQUITY

IN THE CIRCUIT COURT FOR

FREDERICK COUNTY, MARYLAND

* * * * *

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Henry W. Owens and Cora G. Taylor and Claude H. Taylor, her husband and Winifred E. Eubanks and Arthur Eubanks, her husband, Orators by McSherry and Burgee, their Solicitors, respectfully represent unto Your Honors:

FIRST: That they are the owners of all that lot or part of a lot or parcel of land, situate, lying and being in the Petersville Election Districk Frederick County, Maryland, along or near U.S. Route #340, being all the same real estate referred to and described in the deed from Tilgman Brooks to Helen Brooks, dated April 14, 1894, and recorded in Liber JLJ 7, Folio 224, one of the Land Records of Frederick County, Maryland; and more fully described in a deed from Jonathan W. Crum, Jr. to Winnifred Brady, dated April 2, 1866 and recorded May 7, 1866 in Liber JWLC 4, Folio 46, one of the Land Records of Frederick County, Maryland; Beginning at the Northwest corner of Mrs. Watson's lot and running thence South five and three quarters degrees West sixteen and six-tenths perches to a stone planted thence North eighty three and one-half degrees, West nine and seven-tenths perches, thence North five and three quarters degrees, East fifteen and one-tenth perches to the Northwestern corner of the stable on the herein conveyed premises and thence North eighty-eight and one-half degrees East on and with the South side of the Frederick and Harpers Ferry Ridge Road to the first mentioned place of beginning, containing one hundred and fifty three perches of land, more or less.

A copy of the deed recorded in Liber JLJ 7, Folio 224 being filed herewith, prayed to be taken as a part hereof, and marked "Complainants' Exhibit No. 1".

SECOND: The above described real estate is all and the same property that was