

IN THE MATTER	:	UNITED STATES DISTRICT COURT
OF EARL G. OAKES	:	FOR THE DISTRICT OF MARYLAND
S.S. NO. 714-18-2485	:	IN BANKRUPTCY MATTER NO. 12983

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The Petition of Richard E. Zimmerman, Attorney for Loyola Federal Savings and Loan Association, and Assignee of a certain mortgage from Earl G. Oakes and Florence A. Oakes, his wife, respectfully shows unto your Honorable Court:

FIRST: That heretofore, to-wit, on the ~~XXXXXXXXXX~~^{twelfth} day of January, 1967, Earl G. Oakes and Florence A. Oakes, his wife, executed a certain mortgage to Loyola Federal Savings and Loan Association, in the amount of Thirty Thousand Dollars (\$30,000.00), said mortgage being recorded in Liber No. 759, folio 733, one of the Land Records of Frederick County, said mortgage now being in default.

SECOND: That with the unpaid interest included in the computation of the amount due, there is now due Loyola Federal Savings and Loan Association the sum of approximately Thirty-one Thousand, One Hundred Thirty Dollars and Sixty-eight Cents (\$31,130.68).

THIRD: That because of the vacancy of the within property, secured by the aforesaid mortgage, the Petitioner, Loyola Federal Savings and Loan Association, and Richard E. Zimmerman, Assignee for the foreclosure of said mortgage, are unable to obtain any insurance company to underwrite the fire and extended coverage insurance on said property which has now expired.

FOURTH: That there is a very great danger that a material part of the security of Loyola Federal Savings and Loan Association, as well as any equity in the property, which might be available to the general creditors, may be damaged or lost by fire or other causes.

FIFTH: That there are other mortgage liens upon said property junior to that of Loyola Federal Savings and Loan Association.

WHEREFORE, your Petitioner prays your Honorable Court to pass an Order permitting Loyola Federal Savings and Loan Association and its Assignee, Richard E. Zimmerman, to foreclose the mortgage on the aforesaid property, and after the payment of the