

SEVENTH: That to your Petitioner's knowledge, information and belief, any money due under the mortgage described above has been paid.

EIGHTH: That Frank C. Beachley died on November 13, 1948, survived by a son, Frederick E. Beachley, a daughter Miriam A. Beachley (now Erickson) and three grandchildren, Leif B. Erickson, Eric B. Erickson and Judith E. Beachley (now Hubbard).

NINTH: That the Plaintiff is now in possession of the subject real property openly, notoriously, adversely and under claim of right and with color of title, his possession and the possession of his predecessors having continued from about April 24, 1943 to the present time.

TENTH: That a question has been raised as to whether he has a good and marketable title to the subject real property.

WHEREFORE, he asks this Court for the following relief:

1. That this Court take jurisdiction in the matter and enter a decree removing the cloud from his title to the subject real property and that it declare that he has a good and marketable fee simple title to the property and that he may sell, convey, or otherwise deal with the property without regard to the claims of William T. Humphrey and Mary Gertrude Humphrey, his wife, or of the unknown parties (if any) who may claim an interest in the subject real property.

2. That this Court shall declare that the mortgage from William T. Humphrey and Mary Gertrude Humphrey, his wife, to Frank C. Beachley dated July 1, 1914 and recorded in Book 309, page 402, among the Land Records of Frederick County, Maryland, be declared paid and released.

3. That this Court shall pass an Order of Publication under Maryland Rule 111 requiring the unknown parties who may have an interest in the subject real property, addresses unknown, to be and appear in this Court on some day certain to be named in the Order of Publication, to answer these premises and abide by and perform such decree as may be passed therein.