

balance, with interest due monthly. Said mortgage being recorded in Liber 908, Folio 596, one of the Land Records of Frederick County, a copy of said mortgage is attached hereto, marked Exhibit C and prayed to be made a part hereof.

FOURTH: That no other incumbrances or liens upon said property appear of record with the exception of the listed mortgage and no person or persons other than those above listed are interested in said property.

FIFTH: That the subject property is a residential home located in Thurmont, Maryland, and is not capable of division in kind because such division will seriously affect the market value and destroy its usefulness and cannot be divided without loss to the parties in interest.

WHEREFORE, TO THE END THEREFORE:

1. That this Court take jurisdiction of this action.
2. That this Court appoint a Receiver to take possession of the subject property and to have the property sold at public sale and the proceeds of said sale to pay and discharge said promissory note and divide the proceeds from said sale among the Plaintiff and Defendant, Harem J. Geesaman and Isabell B. Geesaman.
3. That this Court may give other relief unto the Plaintiff as appropriate.
4. And, as in duty bound, etc.

*Franklin D. Stillrich*  
Franklin D. Stillrich

*Harem J. Geesaman*  
Harem J. Geesaman

GASTLEY & STILLRICH  
150 West Patrick Street  
Frederick, Maryland 21701  
Phone: 662-8114  
Solicitors for Plaintiff

STATE OF WYOMING, Lincoln COUNTY, TO-WIT:

I hereby certify that on this 28<sup>th</sup> day of March, 1977, before me, the subscriber, a Notary Public of the State and County aforesaid, personally appeared Harem J. Geesaman, and made oath in due form of law that the matters and facts contained in the foregoing Partition for Sale of Real Estate are true and correct to the best of his knowledge, information and belief.

WITNESS my hand and Notarial Seal.

*Hal R. Robinson*  
Notary Public

HAL R. ROBINSON, Notary Public  
My commission expires Aug. 7, 1979

*Filed March 28, 1977*