

JOHN J. PUTMAN

* NO. 29,008 EQUITY

COMPLAINANT

* IN THE

VS.

* CIRCUIT COURT FOR

WILLIAM H. GAGNON AND
LORRAINE V. GAGNON, HIS WIFE, ET AL

* FREDERICK COUNTY,

DEFENDANTS

* MARYLAND

* * * * *

PETITION FOR DECREE PRO CONFESSO

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of John J. Putman, by Ralph L. Gastley, Jr., his solicitor, respectfully represents unto your Honors:

FIRST: That the Bill of Complaint to Foreclose the Equity of Redemption was filed in this cause on the 10th day of May, 1979.

SECOND: That an Order of Publication was published in the Frederick News and Post, a newspaper published in Frederick County, Maryland, such Order being published in each newspaper once a week in each of three (3) successive weeks, warning all persons interested in the said property, to be and appear in Court by the 16th day of July, 1979, to show cause, if any they have, why the relief in the Bill of Complaint should not be granted, all of which more particularly appears by reference to the Certificate of Publication to the Order of Publication filed with the Clerk in this cause on the 11th day of July, 1979.

THIRD: That Ralph L. Gastley, Jr., has made reasonable efforts in good faith to ascertain the identity and/or the addresses of the Defendants and to warn them of the pendency of this action, all of which more particularly appeared by reference to an Affidavit of the said Ralph L. Gastley, Jr., attached hereto and prayed to be taken as a part hereof, and marked "Exhibit No. 1".

FOURTH: That the Defendant, Martha Ann Brittain, Treasurer of Frederick County, was duly served, and that the Defendant, Martha Ann Brittain, filed an Answer to the Bill of Complaint and that the Defendants, William H. Gagnon, Lorraine V. Gagnon, his wife, J. William Brosius and James McSherry, have failed to appear in person or by solicitor within the time allowed by law and the Complainants desire to take testimony to support the allegations of the Bill of Complaint to Foreclose the Equity of Redemption.