

JOSEPH F. MULLEN AND
KATHLEEN MULLEN

COMPLAINANTS

VS.

BIRCH INSURANCE AGENCY, INC., ET AL

DEFENDANTS

* NO. 29,851 EQUITY
*
* IN THE
*
* CIRCUIT COURT FOR
*
* FREDERICK COUNTY
*
* MARYLAND
*
*

PETITION FOR DECREE PRO CONFESSO

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Joseph F. Mullen and Kathleen Mullen, his wife, by Ralph L. Gastley, Jr., their solicitors, respectfully represents unto your Honors:

FIRST: That the Bill of Complaint to Foreclose the Equity of Redemption was filed in this cause on the 24 day of January, 1980.

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 29th day of March, 1980, 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 31st day of March, 1980.

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 appears 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 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, Birch Insurance Agency, Inc., has 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.