

SANFORD J. FOX and  
SANDRA I. FOX, his wife  
14923 Foxville - Deerfield Road  
Lantz, Maryland 21760

\* NO. 30,132 EQUITY

IN THE CIRCUIT COURT FOR

COMPLAINANTS

VS.

FREDERICK COUNTY,

\*

SANFORD FOX, SR.  
14913 Foxville - Deerfield Road  
Lantz, Maryland 21760

MARYLAND

and

DENNIS W. FOX & CECELIA A. FOX \*  
14903 Foxville - Deerfield Road  
Lantz, Maryland 21760

RESPONDENTS

\* \* \* \* \*

BILL OF COMPLAINT TO QUIET TITLE AND OTHER  
RELIEF

Now comes Sanford J. Fox and Sandra Fox, his wife, Complainants, by Lawrence E. Finegan, their attorney, and respectfully represent unto this Court as follows:

1. That the Complainants are the fee simple owners of Lot 1, Section 1, Fox Estates, Hauvers Election District, Frederick County, Maryland, as shown on a plat, recorded in Plat Book 9, page 97, one of the Plat Records of Frederick County, Maryland, a copy of which is attached hereto marked Exhibit 1.

2. That the Respondent, Sanford Fox, Sr. is the fee simple owner of Lot 2, Section 1, Fox Estates, as shown in the aforementioned plat.

3. That the Respondent, Dennis Fox is the fee simple owner of Lot 3, Section 1, Fox Estates, as shown by said plat.

4. That the property of the Respondent, Sanford Fox, Sr., immediately adjoins the Complainant's property.

5. That until the summer of 1979, the Complainants