

Registered Surveyor, no address available; Clyde Beard, Woodsboro, Maryland 21798; Dr. Lee Miller and Marilyn Miller, his wife, Grand Hill Road, Woodsboro, Maryland 21798; Mrs. Smith, a neighbor of the Goellers, Woodsboro, Maryland 21798.

4. Respondents do not contend that they are able to establish record ownership in the 29 acre parcel which is the subject of this action, except by way of the Quit Claim Deed referred to in the ninth paragraph of the Amended Declaration filed herein and designated on the dashed area of the plat filed with said Amended Declaration as Exhibit A. Respondents were advised by counsel and by members of the Dorcus family in the mid 1960's that the property in question was conveyed by the record owners to one Thomas Keeney, now deceased, and a predecessor in title to the 45.407 acre parcel, now owned by Respondents and described in the eighth paragraph of said Amended Declaration. However, no such Deed has been discovered by Respondents.

5. See Answer to Question 4.

6. Respondents claim title by adverse possession on the basis that they and their predecessors in title for at least the last 20 years have openly, notoriously, exclusively and adversely made use of and occupied the disputed 29 acre parcel.

7. Complainant Robert L. Dorcus advised Respondents that he did not know who owned the 29 acre parcel in question. Complainant John C. Dorcus advised Respondents that his father, Harry Dorcus, had sold the disputed property during his lifetime to one Thomas Keeney, a predecessor in title of Respondents to the adjacent farm. John C. Dorcus further advised Respondents that he had seen money passed from Keeney to his father, Harry Dorcus, relating to the transaction. He further