

DAVID HOGBEN \* NO. 31,971 EQUITY  
VS. \* IN THE CIRCUIT COURT FOR  
WILLIAM THOMAS SIMS ESTATE, ET AL \* FREDERICK COUNTY, MARYLAND

\* \* \* \* \*

PETITION FOR DECREE PRO CONFESSO

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of David Hogben, Complainant, by Ralph L. Gastley, Jr. his solicitor, respectfully rperesents unto your Honors:

FIRST: That the Bill of Complaint to Foreclose the Equity of Redemption was filed in this cause on the 26th day of May, 1982.

SECOND: That an Order of Publication was posted on a bulletin borad in the immediate vicinity of the Court House door for sixty (60) days warning all persons interested in the said property, to be and appear in Court by the 26 day of July, 1982, to show cause, if any they have, why the relief prayed in the Bill of Complaint to foreclose the Equity of Redemption should not be granted.

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, 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, William Thomas Sims Estate, c/o Ruth Gray, Patsey Sims, Gladys Molory, Hazel Sellers, Lawrence Walter Gray have failed to appear in person or by solicitor within the time allowed by law and the Complainant desires to take testimony to support the allegations of the Bill of Complaint to Foreclose the Equity of Redemption.

TO THE END, THEREFORE:

1. That the Bill of Complaint be taken Pro Confesso against the said William Thomas Sims Estate, Patsey Sims, Gladys Molory, Hazel Sellers and Lawrence Walter Gray, and the unknown heirs, devisees, personal representatives or successors in interest of William Thomas Sims and Patsey Sims, deceased.

2. That the Complainant be permitted to take testimony to support the