

DAVID NEFF WISE  
325 Somerset Drive  
Shiremanstown, Pennsylvania 17011  
COMPLAINANT

\* NO. 32,824 EQUITY  
\* IN THE CIRCUIT COURT FOR  
\* FREDERICK COUNTY, MARYLAND

VS.

DORIS SHIVAR LINTHICUM  
AND ANY AND ALL OTHER PERSONS  
HAVING, CLAIMING TO HAVE OR ENTITLED  
TO AN INTEREST IN THAT PROPERTY  
KNOWN AS 145-147 WEST PATRICK  
STREET, FREDERICK, MARYLAND  
RESPONDENTS

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MOTION FOR DECREE OF SALE

Comes now the Complainant, David Neff Wise, by his attorney, John W. Chillas, and moves this Honorable Court to issue a Decree of Sale for the property in question and for reason states as follows:

1. The Sheriff set a copy of the Order of Publication and Bill of Complaint upon the real property in lieu of publication in a newspaper as permitted by Maryland Rule of Procedure 111.a.

2. That the time for filing an answer to the said Bill of Complaint expired on the 4th day of November, 1982, and no responsive pleading has been filed.

3. That the value of the property is in the approximate amount of \$46,000.00, as determined by an appraisal of the property by A. Owen Mercer on June 9, 1982 (a copy of the Appraisal is attached hereto as Exhibit 1.)

4. That the Complainant in this case, David Neff Wise, is the owner in fee simple of a 98% interest in the property as determined by a search of the Land Records of Frederick County, Maryland, performed by Virginia L. Kaetzel of The Frederick Title & Abstract Agency, Inc. (See attached Affidavit.)

5. That the Complainant in this case intends to purchase the property at private sale for the appraised value if approved by the Court, and therefore requests the Court to set the required bond at an amount no greater than the outstanding interest of Two Per Cent (2%), or \$920.00.

WHEREFORE, your Complainant prays this Honorable Court pass a Decree directing that the property in question be sold, that David A. Severn, Esquire, 117 West Patrick