

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

GLENN R. MOLER

COMPLAINANT

VS.

EQUITY NO. 34270

MUTUAL LAND AND IMPROVEMENT COMPANY

OF BALTIMORE CITY, ET AL

RESPONDENTS

* * * * *

REQUEST FOR ADMISSION OF FACTS

Complainant, Glenn R. Moler, by his attorneys, Lawrence E. Finegan and Rosenstock, Burgee & Welty, P.A., requests Respondent, Ramona J. Sigler, to make the following admissions:

TAKE NOTICE: Your answers, under oath, must be filed within 30 days of service, or by the day on which your initial pleading is required, whichever shall occur last. Failure to timely answer shall constitute an admission.

1. That each and every Deed referred to in the Bill of Complaint served upon you is true and correct.

2. That at no time since you have come into possession of your property, have you made any use of the land designated on a Plat of Mutual Land Improvement Company of Baltimore City, as a 15 foot wide alleyway, running north-south between Lots 9-16 inclusive and 18-25 inclusive, Block 11 as shown on such plat, situated North of your property line.

3. That you have no knowledge of any use inconsistent with Complainant's claim to title, of the 15 foot wide alley that is the subject of this proceeding.

Lawrence E. Finegan

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