

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

HELEN F. FOSTER,)	
Personal Representative of the)	
Estate of)	
BURTON FOSTER, Deceased)	
Plaintiff)	
)	
v.)	Chancery No. 34128
)	
G. B. MULLIN CO., INC.)	
Defendant)	

COUNTERCLAIM

On or about December 3, 1982 Plaintiff signed a promissory note (copy attached) payable to defendant in the amount of \$333.33 payable out of the proceeds of sale of the 8+ acres of land owned in common, in consideration of defendant's paying the full appraisal fee for having the land valued for purposes of sale. Without conceding that such a sale is proper or appropriate, if the Court orders a sale, defendant demands judgment in the amount of \$333.33 against plaintiff, to be paid from the portion of the sale proceeds due to plaintiff.

Matthew A. Kane

MATTHEW A. KANE
Attorney for Defendant
4720 Montgomery Lane
Bethesda, Maryland 20814
(301) 986-8687

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Counterclaim was mailed, postage prepaid, this 17 day of February, 1984 to Joseph G. Harrison, Jr., Attorney for Plaintiff, 3509 Coastal Highway, Ocean City, Maryland 21842.

Matthew A. Kane

MATTHEW A. KANE

Filed Feb. 21, 1984