

M. RICHARD BEACHLEY
7422 Marker Road
Middletown, Maryland 21769

* IN THE CIRCUIT COURT
* FOR

VS.

* FREDERICK COUNTY,

RANDY D. SOWERS
and
KAREN B. SOWERS
1402 Mountain Church Road
Middletown, Maryland 21769

* MARYLAND
* EQUITY NO. 33070

* * * * *

BILL OF COMPLAINT TO ESTABLISH BOUNDARY LINES

Now comes the Petitioner, M. RICHARD BEACHLEY, by and through his attorney, Russell T. Horman, and states as follows:

1. He is the fee simple owner of all that lot or parcel of land located along the north side of Mountain Church Road in Burkittsville Election District, Frederick County, Maryland, containing 10.106 acres of land, more or less, according to a boundary survey of said property by Rothenhoefer Engineers, Inc., dated October 7, 1981.

2. Title to said property was acquired by deed dated November 12, 1981 from Athene K. Beachley, Mehrle F. Beachley and Katherine B. Beachley, which deed is recorded at Liber 1160, folio 845, among the Land Records of Frederick County, Maryland, a certified copy of which is attached hereto as Exhibit 1 and is incorporated herein by this reference.

3. Respondents, RANDY D. SOWERS and KAREN B. SOWERS, his wife, own all that piece or parcel of land containing sixteen (16) acres and seven (7) square perches of land, more or less, bordering subject property along it's entire western or S. 20° 39' 24" E. boundary for 1,255.53 feet according to the above referenced survey by Rothenhoefer Engineers, Inc.