

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

MARY ANN FOGLE	*
Plaintiff	*
vs.	* Civil Action No. 216E
ROBERT D. FOGLE	*
Defendant	*

* * * * *

ANSWER TO COMPLAINT FOR PARTITION OF REAL PROPERTY

Comes now the Defendant, Robert D. Fogle, by and through his attorneys, Manuel M. Weinberg and Rand D. Weinberg, and files this, his Answer to Complaint for Partition of Real Property and in support thereof states as follows:

1. That the Defendant admits the allegations contained in paragraph 1.
2. That the Defendant admits the allegations contained in paragraph 2.
3. That the Defendant admits the allegations contained in paragraph 3.
4. That the Defendant admits the allegations contained in paragraph 4.
5. That the Defendant admits the allegations contained in paragraph 5 in part, but denies that the Plaintiff has contributed any money or effort to the maintenance and upkeep of said property since she voluntarily removed herself from said property on August 7, 1978, and that since said date the Defendant has solely maintained and kept up the property and has paid all expenses associated with said upkeep of the property. Said expenses include, but are not limited to, real estate taxes, mortgage payments, insurance, repairs and maintenance, water and sewer charges and utility costs.

WHEREFORE, the Defendant prays:

- a. That the Complaint for Partition of Real Property be granted and that this Honorable Court order the sale of the