

MARY ANN FOGLE	*	IN THE
Plaintiff	*	CIRCUIT COURT
vs.	*	OF MARYLAND
ROBERT D. FOGLE	*	FOR FREDERICK COUNTY
Defendant	*	Civil Action No. 216E
* * *	* * *	* * *

JOINT MOTION FOR SALE OF REAL PROPERTY AND ANCILLARY RELIEF

Come now Mary Ann Fogle, Plaintiff, by Steven T. Blomberg and Gimmel, Weiman & Savitz, P.A., her attorneys, and Robert D. Fogle, Defendant, by Rand D. Weinberg and Weinberg & Weinberg, his attorneys, and jointly move for the sale of real property and ancillary relief and respectfully represent as follows:

1. That the parties hereto acquired as tenants in common the real property known as 4 Sunset Avenue, Mt. Airy, Maryland 21771, being the same property conveyed to the parties by deed dated October 6, 1966 and recorded in Liber 756, folio 232, among the Land Records of Frederick County, Maryland.

2. That, as evidenced by the pleadings in this case, the parties agree that the real property known as 4 Sunset Avenue, Mt. Airy, Maryland 21771 cannot be partitioned in kind and both parties therefore seek a judicial sale of the said real property.

3. That the parties agree that their respective counsel, Steven T. Blomberg and Rand D. Weinberg, should be appointed Co-Trustees for the sale of said real property.