

Fourth: That there is currently due to the Plaintiffs the sum of \$40,000.00 principal, \$1,150.68 interest through February 8, 1985, attorney fees of \$6,600.00 pursuant to the terms of said Note and Courts costs. Addition interest after February 8th accrues at the rate of \$7.67 per day.

Fifth: That the said mortgage document contains an assent to a decree for the sale of the property mortgaged as more fully set forth in the said mortgage filed herewith marked Exhibit "C".

Sixth: That the Plaintiffs believe that the property mortgaged is a rental property and is generating approximately \$1,000.00 a month in rents which are currently being paid to the Defendant by the tenants of said building.

Seventh: The property is subject to an open first mortgage to First National Bank of Maryland in the face amount of \$50,000.00

EIGHTH: Plaintiffs believe it is necessary for the protection of their interests in the property that a receiver be appointed pursuant to the terms of said mortgage to collect the rents and profits from the property mortgaged until such time as the sale under the terms of the mortgage is completed.

WHEREFORE Plaintiff pray:

1. That a trustee be appointed for James V. Carone by appointed Trustee for the purpose of the sale of said property pursuant to Maryland Rules of procedure Rule W 72(c)(2) and Maryland Rule W 72(c)(3).

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