

JAMES V. CARONE AND  
GWENDOLYN G. CARONE  
2921 Carone Drive  
Jefferson, Maryland 21755  
Plaintiffs

VS

MORRIS KOSMAN  
201 East Second Street  
Frederick, Maryland 21701  
Defendant

IN THE  
CIRCUIT COURT  
FOR  
FREDERICK COUNTY  
MARYLAND  
NO. 772 E

AMENDED COMPLAINT FOR FORECLOSURE

James V. Carone and Gwendolyn G. Carone, his wife, Plaintiffs, by Elliot & Nicklas, P.A. and F. T. Elliot, their attorneys, represent unto this Honorable Court:

First: That James V. Carone and Gwendolyn G. Carone, his wife, hold a certain Promissory Note dated September 11, 1984, a copy of which is attached hereto and marked as Exhibit "A" by which the Defendant promised and agreed to repay to the Plaintiffs the sum of Forty Thousand Dollars (\$40,000.00) together with interest thereon, all as is set forth in said Note.

Second: That the first installment due to have been paid on said Note is in default.

Third: That the Plaintiffs made demand on the Defendant for the repayment of the whole sum due by letter dated January 7, 1985, but the sum due under the terms of said Note has not been received.