

2. That as set forth in the Complaint, this property is used, and has been used for over twenty (20) years, as a parking lot for the residents and tenants of the property owned by the Plaintiff located at 202 College Avenue, Frederick, Maryland.

3. Currently there are four (4) tenants living in the said property, which tenants pay rent to the Plaintiff for their occupancy of apartments in the said property located at 202 College Avenue.

4. Since January or February, 1986, the said named Defendant or his lessees have taken certain actions interfering with the Plaintiff's use of the aforescribed property; specifically the said Defendant or his lessees have parked a large truck on the property, taking up much of the space which the tenants of the Plaintiff had theretofore used as offstreet parking space. As a result of the said actions of the said Defendant, the Plaintiff's tenants have been denied their offstreet parking and have registered complaints of such to the Plaintiff and her agents.

5. The Plaintiff stands to suffer irreparable harm by reason of the said activities of the Defendant in interfering with her possession of the aforescribed property, in that when the tenants currently leasing the said property entered into leases for apartments at the property, offstreet parking was advertised as one of the benefits of renting those particular apartments. The availability of such offstreet parking is considered to be of the utmost importance to the Plaintiff's tenants, and