

14. That Defendants Gerald W. and Jeanne M. Beckman are the owners of a parcel of land designated as Parcel 198, Section 5, on the aforesaid Map 39. Said Defendants are named herein solely because, by proximity to the subject lots, they may have an interest therein.

15. That Defendants Donald J. and Marie C. Kendall are the owners of a parcel of land designated as Parcel 257 on Map No. 40 of the Tax Maps of Frederick County, Maryland. A copy of said Map No. 40 is attached hereto as Exhibit H. Said Defendants are named herein solely because, by proximity to the subject lots, they may have an interest therein.

16. That Defendants Steven M. and Marcia L. Dorcus are the owners of a parcel of land designated as Parcel 506, Lot 1, Section 1.3 acres on the aforesaid Map 40. Said Defendants are named herein solely because, by proximity to the subject lots, they may have an interest therein.

17. That Defendants Ronnie L. and Lois A. Welty are the owners of a parcel of land designated as Parcel 506, Lot 2, Section 1.05 acres on the aforesaid Map 40. Said Defendants are named herein solely because, by proximity to the subject lots, they may have an interest therein.

18. That Defendant Joseph Carlotti is the owner of a parcel of land designated as Parcel 507 on the aforesaid Map No. 40. Said Defendant is named herein solely because, by proximity to the subject lots, it may have an interest therein.

19. That Plaintiff and her predecessors in title have been in actual and peaceable possession of the aforesaid Parcels E and B designated on the Plat for an uninterrupted period of more than twenty (20) years prior to the filing of this Complaint, and as is more fully set forth in the affidavit attached to the accompanying Motion for Summary Judgment.

20. That no actions at law or equity are pending in any court with respect to the land that is the subject of this proceeding, and that the Plaintiff is entitled to a judgment declaring her to be the holder of good and marketable title in fee simple to the aforesaid Parcels E and B on the Plat.

22. That other than title search and identification of persons who may have claim to the subject property as disclosed thereby, Plaintiff has no other method of determining the whereabouts of any other persons who may have claims against the property that is the subject of this action.

WHEREFORE, Plaintiff requests that this Honorable Court:

A. Order that any and all unknown persons having any interest in the land that is the subject of this proceeding be served with process by posting the land pursuant to Maryland Rule 2-122;

B. Declare that Plaintiff has good and marketable fee simple title to the aforesaid Parcels E and B on the Plat; and