

Alvey J. Forrest	:	IN THE
	:	
Plaintiff	:	CIRCUIT COURT
	:	
VS.	:	FOR
	:	FREDERICK COUNTY, MARYLAND
Jean Stotler	:	
806 Hbsperides Road	:	
Lake Wales, Florida 33853	:	
	:	
Raymond Smith	:	
11306 E Pleasant Walk Road	:	
Myersville, Maryland 21773	:	
	:	
Gerald Smith	:	
344 Mulberry Street	:	
Hagerstown, Maryland 21740	:	
	:	
ALL PERSONS HAVING OR CLAIMING:	:	
TO HAVE ANY INTEREST IN THE	:	CIVIL NO. 2932 E
PROPERTY HEREIN DESCRIBED	:	
	:	
Defendant	:	

AMENDED COMPLAINT TO QUIET TITLE

Plaintiff, Alvey J. Forrest, by his attorney, Tod P. Salisbury, states that:

(1) Plaintiff is an adult citizen of the United States who resides in Frederick County, Maryland, and is the fee simple owner of a parcel of land off Pleasant Walk Road, Catoctin Election District, Frederick County, Maryland, by virtue of a Deed dated July 30, 1966 from Stanley W. Schroyer and Edna E. Schroyer to Plaintiff recorded among the Land Records of Frederick County, Maryland, in Liber 752, folio 200 a copy of which Deed is attached hereto marked Exhibit A and incorporated herein by reference.

(2) The copy described above includes a 1.926 acre parcel which is more fully described on attached Deed description marked Exhibit B and on the attached plat marked Exhibit C.

(3) Possession of said subject property by Plaintiff and his predecessors in title has been actual, open, notorious and visible, exclusive, hostile, and continuous for a period in excess of 20 years prior to the filing of this Complaint.

(4) The affidavit of Plaintiff who has owned said property from July 30, 1966 until present is attached hereto as Exhibit D.