

LAKE LINGANORE ASSOCIATION, INC.	*	IN THE
P. O. Box 489		
Frederick, MD 21701	*	CIRCUIT COURT
Plaintiff	*	FOR
vs.	*	FREDERICK COUNTY,
THOMAS J. DONOHUE	*	MARYLAND
ELIZABETH A. DONOHUE		
8008 Coach Street	*	CIVIL NO. <u>3751E</u>
Potomac, MD 20854	*	
		Defendants

* * * * *

COMPLAINT TO FORECLOSE

Now comes Lake Linganore Association, Inc., by its attorney, Lucien T. Winegar, and for this Complaint, states as follows:

FIRST: That Defendants are the record owner of certain real estate being known as Lot 534 Pinehurst V, Plat 4, at Eaglehead in Frederick County, Maryland.

SECOND: That the Defendants have failed to pay regular assessments as required by the governing covenants of the Plaintiff Association in the amount of One Hundred Thirty per year with certain penalties and other charges for non-payment.

THIRD: That attached to this Complaint is a Statement of Debt of the unpaid assessment amount remaining due and payable which Statement is incorporated by reference herein.

FOURTH: That a Statement of Lien as required by Subtitle 2, Maryland Contract Lien Act, Real Property Article, Annotated Code of Maryland, has been filed among the Land Records of Frederick County, Maryland, in Liber 1302, folio 313.

FIFTH: That Donald Gorman is the manager and corporate secretary of the Plaintiff Association.

LUCIEN T. WINEGAR
ATTORNEY AT LAW
FREDERICK, MD.
21701