

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.

6. That Defendant Lawson Downey is the owner of the parcel of land designated as Lot No. 9, in Block No. 21, as shown on the aforementioned Plat, pursuant to Map 12 of the Tax Maps of the Town Brunswick, Frederick County, Maryland. That a copy of said tax map is being attached hereto as Plaintiffs Exhibit D and is prayed to be made a part hereof. That said tax maps do not provide a Liber/folio reference however; the State Assessment office for Frederick County does not have an address for said individual and has not collected any recent real property taxes thereon except for the taxes on the improvements paid by Plaintiffs; and a diligent search of the Land Records of Frederick County, Maryland, has failed to reveal a deed unto said Lawson Downey.

7. That the Defendants Ching-Tai B. Kao and Kung Y. Tao Kao, are the owners of the Parcel of land designated as Lot No. 8, in Block No. 21, as shown on the aforementioned Plat, pursuant to Map 12 of the Tax Maps of the Town of Brunswick, Frederick County, Maryland.

8. 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 them to be the holder of good and marketable title in fee simple to the aforesaid Lots No. 8 and 9, in Block No. 21, as