

10. That the Defendants White, through their Solicitor, continue to refuse to perform their contract (Exhibit "A"), stating that said Deed of Release from the State Roads Commission is not sufficient to clear up said Commission's apparent claim of rights in the aforesaid real estate.

11. That the Maryland State Roads Commission, through their Solicitor, refuses to give any further deed or release to clear up the objections of the Defendants White.

12. That an actual controversy exists between your Petitioners, the Defendants White and the Maryland State Roads Commission so that the antagonistic claims present between the parties indicate imminent and inevitable litigation; that your Petitioners assert their right and title to the entire dwelling and to at least six (6) feet of land in front of said dwelling and between it and Alternate Rt. #40 and they assert their legal right to convey said property free and clear of encumbrances and in accordance with the terms of the contract Exhibit "A" and to require the Defendants White to specifically perform their part of said Contract; while the Defendants White claim that the recorded Maryland State Roads Commission Plats indicate that your Petitioners do not have clear title and that the Said Roads Commission claims not only the land in front of said dwelling, but to part of the dwelling as well; and the Maryland State Roads Commission, while releasing all that they planned to take under said Plats refuses to acknowledge that they do not claim some interest in the land north of said solid black line running through the dwelling as shown on said plat; and it appears that a Declaratory Judgment or Decree will serve to terminate the uncertainty and controversy giving rise to these proceedings.

WHEREFORE, your Petitioners pray:

1. That your Honors will pass a Declaratory Decree under the Uniform Declaratory Judgments Act quieting title to said property and declaring the rights and obligations of the various parties in this proceeding in reference to said real estate.

2. And that your petitioners may have such other and further

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