



**CIRCUIT COURT FOR ANNE ARUNDEL COUNTY,
MARYLAND**
8 Church Circle
Annapolis, Maryland 21401

Main: 410-222-1397
Civil: 410-222-1431
Criminal: 410-222-1420
Juvenile: 410-222-1427
Trust/Adoption: 410-222-1331
TTY for Deaf: 410-222-1429
Maryland Relay Service: 711

To: VENICE BEACH CITIZENS ASSOCIATION INC
SERVE: NANCY BOWMAN WILLIAMS, PRESIDENT → 1/4/2020
1425 CHESAPEAKE AVENUE
ANNAPOLIS, MD 21403

Case Number: C-02-CV-19-003841
Other Reference Number(s):

CHARLES RILEY, JR., ET AL. VS. VENICE BEACH CITIZENS ASSOCIATION INC

Issue Date: 12/2/2019

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 30 days after service of this summons upon you, in this Court, to the attached complaint filed by:

CHARLES RILEY, JR.; BAY PRIDE LLC
3222 Wayman Avenue
Annapolis, MD, MD 21403; 3222 Wayman Avenue
Annapolis, MD 21403

This summons is effective for service only if served within 60 days after the date it is issued.

Scott A. Poyer

Scott A. Poyer
Clerk of the Circuit Court

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.
Personal attendance in court on the day named is NOT required.

Instructions for Service:

1. This summons is effective for service only if served within 60 days after the date issued.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Maryland Rule 2-126.
4. If this notice is served by private process, process server shall file a separate affidavit as required by Maryland Rule 2-126(a).

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

CHARLES RILEY Jr. REVOCABLE TRUST
3222 Wayman Avenue
Annapolis, Maryland 21403

And

BAY PRIDE, LLC
3222 Wayman Avenue
Annapolis, Maryland 21403

Plaintiffs

Vs.

VENICE BEACH CITIZENS
ASSOCIATION, INC.

Case No.: C-02-CV-19-003841

SERVE ON:
Nancy Bowman Williams,
President
1425 Chesapeake Avenue
Annapolis, Maryland 21403

Defendant

COMPLAINT FOR SALE IN LIEU OF PARTITION
AND TO QUIET TITLE

The CHARLES RILEY Jr. REVOCABLE TRUST, ("RILEY TRUST") and BAY PRIDE, LLC ("BAY PRIDE"), Plaintiffs, by their attorneys, Council, Baradel, Kosmerl & Nolan, P.A. and Wayne T. Kosmerl sues the VENICE BEACH CITIZENS ASSOCIATION INC. ("VENICE BEACH"), Defendant and request this Honorable Court to appoint

a trustee to sell that certain parcel of real property, consisting of approximately 4791 square feet, more or less, located on Wayman Avenue, Venice Beach, Anne Arundel County, Maryland, Tax Identification No.02-886-9005-4743 (the "Parcel"), Quiet Title to the Parcel, and for such other relief as herein requested, and in support thereof state the following:

1. Plaintiff, the RILEY TRUST, is a Maryland revocable trust which owns residential property located at 3222 Wayman Avenue, which is adjacent to the Parcel (described on Exhibit A attached), by virtue of a deed recorded among the Land Records in Book 23732, folio 450 attached hereto as Exhibit B. The RILEY TRUST claims fee simple concurrent title and ownership, by adverse use and possession, to that portion of the Parcel shaded in yellow on attached Exhibit C (consisting of approximately 400 square feet) based upon its (and its predecessors' in title) open, actual, hostile, notorious, exclusive and continuous use and possession of the described area for more than thirty(30) years.

2. Plaintiff, BAY PRIDE, acquired title to the entire Parcel from the Trustees of the Jones Living Trust ("Jones Trust") by virtue of a Quit Claim Deed dated June 20, 2019, and recorded among the Land Records of Anne Arundel County in Book

33275 at Folio 393 and attached as Exhibit D. The Jones Trust paid all of the property taxes assessed against the Parcel for more than twenty (20) years. Said Jones Trust deed transferred unto BAY PRIDE, all of the right, title and interest of the Jones Trust in and to the entire Parcel, together with, any interest that the Jones Trust may have had in the Parcel by virtue of its adverse possession and use of same. BAY PRIDE, based on the tacking of the open, hostile, notorious, continuous and adverse possession of the Jones Trust, and its predecessors in title, for more than thirty (30) years, claims fee simple title to the entire Parcel, saving and excepting that 400 square foot portion of the Parcel claimed by the RILEY TRUST through adverse possession as stated in Paragraph 1 above.

3. Defendant, VENICE BEACH, purportedly acquired a 37.5% interest in the Parcel by virtue of a Quit Claim dated June 30, 2017 and recorded among the Land Records of Anne Arundel County in Book 31119 at Folio 247 and attached as Exhibit E. The claims of VENICE BEACH with respect to the aforesaid 37.5% interest would be adverse to that of BAY PRIDE.

4. The RILEY TRUST, BAY PRIDE, and VENICE BEACH, based on the aforesaid recorded deeds and claims, are tenants in common with respect to the Parcel.

5. There are no liens or encumbrances appearing of record

on the Parcel. The Plaintiffs know of no other parties who claim an interest in the Parcel, or who will be materially affected by this action.

6. The Parcel is unimproved and cannot be lawfully subdivided or partitioned so as to create two or more legal lots which would conform to applicable Anne Arundel zoning regulations.

7. Disagreement has arisen among the parties as to the proper use of the Parcel and a determination of each of the parties' interest in the Parcel and a sale of the Parcel would be in the best interests of the Plaintiffs and Defendant.

8. **WHEREFORE**, Plaintiffs request the Court to:

A. Appoint a trustee to list for sale and to sell the Parcel;

B. Order that all trustee's fees and costs of sale be paid in full from the proceeds of the sale of the Parcel;

C. Determine the ownership interests of the Plaintiffs and the Defendant in and to the Parcel and then declare what percentage of ownership each of the parties have (if any) in the Parcel.

D. Order that the remaining net proceeds of sale be divided and distributed to the parties in accordance with their respective ownership interests;

E. Award the Plaintiffs reasonable attorney's fees and costs incurred in obtaining this relief;

F. Enter a monetary judgment in favor of the Plaintiffs against the Defendant for any fees and costs so awarded; and

G. For such other and further relief as the Court may deem proper.

Respectfully submitted,

COUNCIL, BARADEL,
KOSMERL & NOLAN, P.A.

By: 

WAYNE T. KOSMERL

125 West Street, Fourth Floor
Annapolis, Maryland 21401
(410) 268-6600

Email: Kosmerl@councilbaradel.com

Counsel for Plaintiffs

VERIFICATION

I, Charles Riley, the sole managing member of Bay Pride, LLC and the sole trustee of the Charles Riley, Jr. Revocable Trust, am duly authorized on behalf of said limited liability company and revocable trust to execute this Verification under oath. I hereby swear and affirm under the penalties of perjury that the matters and facts contained herein are true and correct to the best of my personal knowledge, information and belief.

Bay Pride, LLC
By: Charles Riley Jr.
Charles Riley Jr., Sole managing Member

Charles Riley, Jr. Revocable Trust
By: Charles Riley Jr.
Charles Riley, Jr., Sole Trustee

EXHIBIT A
METES AND BOUNDS DESCRIPTION OF PARCEL

Wayman Avenue, Venice Beach, Anne Arundel County, MD
Tax Identification Number: 2886-9005-4743

Beginning for the same at the South corner of Lot 1, Block A as per Plat of lots designated as a Subdivision known as Venice Beach in the Second Election District, Anne Arundel County on file in the Land Records of Anne Arundel County in the State of Maryland and designated as Plat 965 in Plat Book 21, folio 37 (see also Plat 24, Plat Book 2, folio 20, Plat 120, Plat Book 3, folio 45, Plat 370, Plat Book 7, folio 13), running thence S 53 degrees 30 minutes E along Chesapeake Avenue approximately 66 feet; thence Northerly following Wayman Avenue to meet a line running S 53 degrees 30 minutes E which is an extension of the boundary between Lots 2 and 3, Block A; thence N 53 degrees 30 minutes W approximately 18 feet along this line to the East corner of Lot 2, Block A; thence S 38 degrees 20 minutes W 100 feet to the point of beginning. Containing 4650 square feet, more or less.

After Recording, Return to:
Wayne T. Kosmerl, Esquire
Council Baradel Kosmerl & Nolan
125 West Street 4FL
Annapolis MD 21401

IMP FD SURE 40.00
RECORDING FEE 20.00
TOTAL 60.00
Rec# AA12 Rcpt # 38870
RPD LLS Bk # 711
Aug 22, 2011 12:42 PM

FOR ESTATE TRANSFER PURPOSES
TRANSFER TO A TRUST
NO TITLE EXAMINATION
NO CONSIDERATION
Tax Id: 2886-1243-1410

DEED

THIS DEED, made this 17th day of AUGUST, 2011, by and between CHARLES RILEY, JR., a/k/a Charles Riley (hereafter called "the Grantor"), and CHARLES RILEY, JR., TRUSTEE OF THE CHARLES RILEY, JR. REVOCABLE TRUST dated the 6th day of April, 2011, (hereafter called "the Grantee").

WHEREAS, this is a no consideration deed transferring an interest in real property to the Grantor's Trust in which Grantor is the primary beneficiary.

WITNESSETH, that for no consideration (\$0.00), the receipt of which is hereby acknowledged, the said Charles Riley, Jr. hereby grants and conveys to the said Grantee, his successors and/or assigns, in fee simple, all that property, situate, lying and being in Anne Arundel County, Maryland, and described as follows:

BEING LOT 3 in Block A as per plat of lots designated as Venice Beach, which Plat was caused to be made by and for Osborn T. Taylor and which Plat is of record in the Land Records in and for the County of Anne Arundel, Maryland, in Plat Book No. 2, folio 12, now Plat Book 2, folio 20. See also Plat Book 3, folio 45 and Plat Book 2, folio 40. Not only the said Lot No. 3, in Block A, as above described, but all lands for a frontage of fifty (50) feet leading down to the Bay in fee simple, to the Grantee, heirs and assigns, but it is further distinctly understood and agreed that this piece of land between the front of said Lot No. 3 and the Bay shall be reserved for and used by the general public forever for beach and parking purposes and any other uses incident to the public use of a bathing beach front.

BEGINNING for the second commencing for the same at the

ACCT. 2886 12431410
ALL LIENS ARE PAID AS
OF 8-22-11 A.A. COUNTY
BY: [Signature]

SEMI-ANNUAL PAYMENTS

8/22/2011 12:21 PM Cdb 0001 Reg 0003
T/Ref 0003038329
01 - Recordation Tax Division
\$0.00
Validation Number: 0003-041556
Instrument Type: Deed

ANNE ARUNDEL COUNTY CIRCUIT COURT (Land Records) RPD 23732, p. 0449, MSA_CE59_24076. Date available 08/26/2011. Printed 10/23/2018.

2011 AUG 22 P 1:47

RECEIVED FOR RECORDING
CIRCUIT COURT, A.A. COUNTY

west corner of a original Lot Block A, of a subdivision known as Venice Beach, in the Second Election District of Anne Arundel County, running thence South 38 degrees 20 minutes West 14 feet; thence South 53 degrees 30 minutes East 150 feet; thence North 38 degrees 20 minutes East 14 feet to the Southwest line of Lot 3; thence with said line North 53 degrees 30 minutes West 150 feet to the point of beginning. Containing 2,100 square feet, more or less.

ALSO known as 3222 Wayman Avenue, Annapolis MD 21403.

BEING the same property which by Deed dated October 21, 1987 and recorded among the Land Records of Anne Arundel County in Liber 4493, folio 291, was conveyed by Henry G. Williams unto Grantor herein.

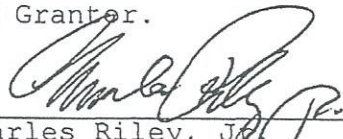
TOGETHER with the buildings and improvements thereupon erected, made or being, and all and every of the rights, alleys, ways, waters, privileges, appurtenances and advantages, to the same belonging, or anywise appertaining.

TO HAVE AND TO HOLD the said described property and premises, unto and to the use of the said CHARLES RILEY, JR., TRUSTEE OF THE CHARLES RILEY, JR. REVOCABLE TRUST dated the 6th day of April, 2011, his successors and/or assigns, in fee simple.

AND the said Grantor hereby covenants that he has not done or suffered to be done any act, matter or thing whatsoever to encumber the property hereby conveyed; that he will warrant specially the property hereby granted; and that he will execute such further assurances of the same as may be requisite.

WITNESS the hand and seal of said Grantor.

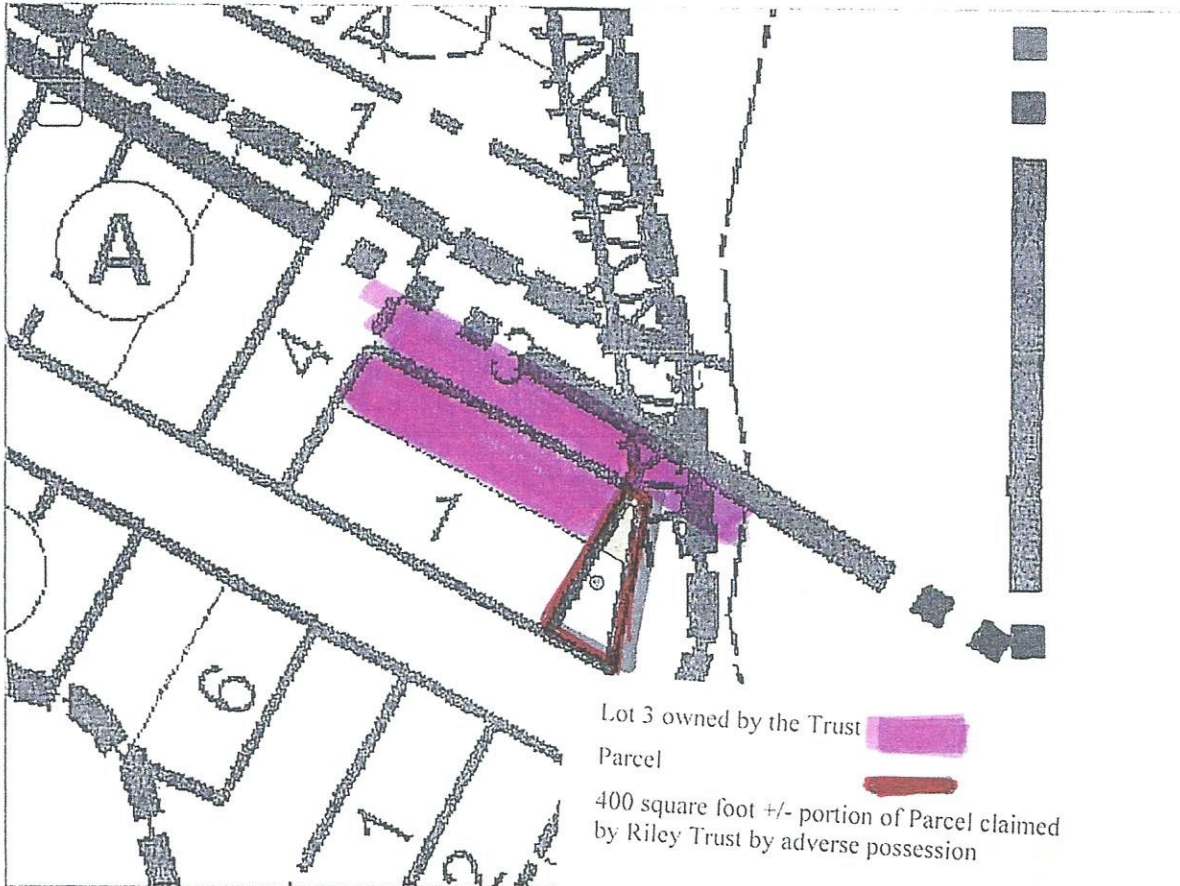
Masume P Chew
Witness

 (SEAL)
Charles Riley, Jr.
a/k/a Charles Riley

Anne Arundel County

[New Search \(https://sdat.dat.maryland.gov/RealProperty/\)](https://sdat.dat.maryland.gov/RealProperty/)

District: **02** Subdivision: **886** Account Number: **90054743**



The information shown on this map has been compiled from deed description descriptions. Users noting errors are urged to notify the Maryland Department of Planning.

If a plat for a property is needed, contact the local Land Records office where Archives at www.plats.net (<http://www.plats.net>).

Property maps provided courtesy of the Maryland Department of Planning.

For more information on electronic mapping applications, visit the Maryland Department of Planning web site at <http://planning.maryland.gov/Pages/OurProducts/OurProducts.aspx> (<http://planning.maryland.gov/Pages/OurProducts/OurProducts.aspx>).

Anne Arundel Cty Finance Office
County Transfer Tax \$165.00
County Recordation Tax \$115.50
06/25/2019 06:46 AM LO

Anne Arundel Cty Cir Crt
IMP FD SURE \$40.00
RECORDING FEE \$20.00
TR TAX STATE \$82.50
TOTAL \$142.50
SAP WO
Jun 25, 2019 02:03 pm

QUITCLAIM DEED


THIS QUITCLAIM DEED, made this 20th day of June, 2019 by and between, **STEPHANY R. GRILLO** and **RICHELLE L. THOMAS**, Successor Trustees, under the Jones Living Trust, dated April 26, 1999, and any Amendments thereto ("Grantor") and Bay Pride, LLC, a Maryland Limited Liability Company ("Grantee") in consideration for the sum of \$16,500.00 and other good and valuable consideration, Grantor does hereby grant and convey unto the Grantee all of its interest in and to the real property located in Anne Arundel County, State of Maryland, described in Exhibit A attached hereto and made a part hereof.

TOGETHER with the buildings and improvements thereupon, made or being; and the rights, alleys, ways, waters, privileges, appurtenances and advantages thereto belonging, or in anywise appertaining.

TOGETHER with any and all claims of adverse possession or adverse use which Grantor may have with respect to the property described on Exhibit A.

WITNESS the hands and seals of the Grantor hereto on the day and year first above written.

JONES LIVING TRUST


Witness


STEPHANY R. GRILLO, [SEAL]
SUCCESSOR TRUSTEE

as to both
Witness


RICHELLE L. THOMAS, [SEAL]
SUCCESSOR TRUSTEE

ACCT. 02-886-90054743
ALL LIENS ARE PAID AS
OF 06-24-2019 A.A. COUNTY
BY: KB


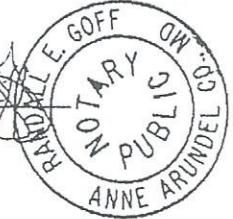
Return Documents to:
Bay Title Company
125 West Street, 4th Floor
Annapolis, MD 21401

Our File: 9953.742

STATE OF MARYLAND
CITY/COUNTY OF ANNE ARUNDEL, to wit:

I HEREBY CERTIFY that on this 20th day of June, 2019, before me, the subscriber, a Notary Public in and for the State and County aforesaid, personally appeared STEPHANY R. GRILLO and RICHELLE L. THOMAS, and acknowledge themselves to be the Successor Trustees of the Jones Living Trust, dated April 26, 1999, and any Amendments thereto, known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument and who acknowledged that they executed the same in their capacities as Successor Trustees for the purposes herein contained.

IN WITNESS WHEREOF, I have herein set my hand and official seal.


Notary Public


My Commission Expires: 3/1/23

THE UNDERSIGNED HEREBY CERTIFIES THAT THIS INSTRUMENT WAS PREPARED BY OR UNDER THE SUPERVISION OF AN ATTORNEY ADMITTED TO PRACTICE BEFORE THE COURT OF APPEALS OF MARYLAND.

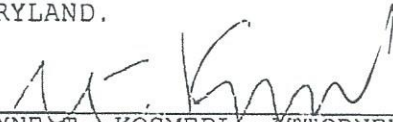

WAYNE T. KOSMERL, ATTORNEY AT LAW
(410) 268-6600

EXHIBIT A

Wayman Avenue, Venice Beach, Anne Arundel County, MD
Tax Identification Number: 2886-9005-4743

Beginning for the same at the South corner of Lot 1, Block A as per Plat of lots designated as a Subdivision known as Venice Beach in the Second Election District, Anne Arundel County on file in the Land Records of Anne Arundel County in the State of Maryland and designated as Plat 965 in Plat Book 21, folio 37 (see also Plat 24, Plat Book 2, folio 20, Plat 120, Plat Book 3, folio 45, Plat 370, Plat Book 7, folio 13), running thence S 53 degrees 30 minutes E along Chesapeake Avenue approximately 66 feet; thence Northerly following Wayman Avenue to meet a line running S 53 degrees 30 minutes E which is an extension of the boundary between Lots 2 and 3, Block A; thence N 53 degrees 30 minutes W approximately 18 feet along this line to the East corner of Lot 2, Block A; thence S 38 degrees 20 minutes W 100 feet to the point of beginning. Containing 4650 square feet, more or less.

Being the same property conveyed unto the within Grantor by Deed dated April 26, 1999 and recorded among the Land Records in Anne Arundel County, Maryland, in liber 9262 at folio 518, et seq.

BOOK: 31119 PAGE: 247

LR - Deed (No-Taxes)
Recording Fee 20.00
Name: COOPER CHC
Ref:
LR - Deed (No-Taxes)
Surcharge 40.00
SubTotal: 60.00
Total: 60.00
06/30/2017 02:07
CC02-SB
#8880580 CC0501 - Anne
Arundel
County/CC05.01.10 -
Register 10

NO TITLE EXAMINATION
NO CONSIDERATION
Tax ID 02-886-90010756

DEED

THIS DEED made this 9 day of JUNE, 2017, by and between Edward S. Cooper, Personal Representative of the Estate of Jean Marie Wilder Cooper, a/k/a Jean Wilder Cooper, Estate Number 91762 in the Orphans' Court for Anne Arundel County, party of the first part, Grantor, and Venice Beach Citizens Association, Inc., a Maryland Corporation, party of the second part, Grantee.

WITNESSETH: Grantor, for no monetary consideration (\$0.00) does hereby grant and convey to the Grantee, its successors and assigns, all of the Grantor's Thirty Seven and One Half (37½%) percent interest in and to all those lots and parcels of ground situate, lying and being in the Second Assessment District of Anne Arundel County, Maryland and described as follows:

See Exhibit A


BEING all of the property conveyed to the Estate of Jean Wilder Cooper and the Estate of Jean W. Cooper by Deeds dated May 17, 2016 and recorded among the Land Records of Anne Arundel County in Liber 29671, folio 336 and folio 341, respectively.

TOGETHER with the buildings and improvements thereupon erected, made or being, and all and every the rights, alleys, ways, waters, privileges, appurtenances and advantages to the same belonging or in anywise appertaining.

TO HAVE AND TO HOLD the property above described and mentioned, and hereby intended to be conveyed, unto and to the proper use and benefit of the said Venice Beach Citizens Association, Inc., its successors and assigns, in fee simple.

WITNESS the hand and seal of the said Grantor.

WITNESS:



Edward S. Cooper (SEAL)

Edward S. Cooper, Personal Representative
of the Estate of Jean Marie Wilder Cooper,
a/k/a Jean Wilder Cooper

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
DENNIS J. CALDWELL, Notary Public
City of Philadelphia, Phila. County
My Commission Expires May 15, 2020

ACCT. 288690010756
ALL LIENS ARE PAID AS
OF 11/30/17 A.A. COUNTY
BY: RJ

06/30/17 01:14 PM C 0001 R 0003
Val #: 0003-200146 \$0.00
Deed - Recordation Tax - Exempt
Instrument Type: Deed

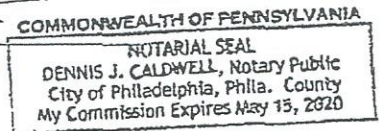
STATE OF PA, COUNTY OF Phila, to wit:

I HEREBY CERTIFY, that on this 9th day of JUNE, 2017, before me, the subscriber, a Notary Public of the State and DA aforesaid, personally appeared Edward S. Cooper, Personal Representative of the Estate of Jean Marie Wilder Cooper, a/k/a Jean Wilder Cooper, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he, being authorized so to do, executed the same for the purposes therein contained, and in my presence signed and sealed the same.

AS WITNESS my hand and Notarial Seal.

My Commission expires: 3/15/2020


Notary Public



THIS IS TO CERTIFY that the within instrument was prepared by or under the supervision of the undersigned, an attorney at law.


Anthony F. Christhilf, Attorney

RETURN TO:
ANTHONY F. CHRISTHILF, ESQUIRE
150 South Street, #206
Annapolis, MD 21401
410-269-6424

AFC/dceds/VeniceBeachDeedCooper.doc

ANNE ARUNDEL COUNTY CIRCUIT COURT (Land Records) RPD 31119, p. 0248, MSA_CE59_31561. Date available 07/17/2017. Printed 06/18/2017.

Exhibit A

Parcel 1:

All of that ground commencing for the same at the South corner of Lot 1, Block A as per Plat of Lots designated as a Subdivision known as Venice Beach in the Second Election District, Anne Arundel County on file in the Land Records of Anne Arundel County in the State of Maryland and designated as Plat 965 in Plat Book 21, folio 37 (see also Plat 24, Plat Book 2, folio 20, Plat 120, Plat Book 3, folio 45, Plat 370, Plat Book 7, folio 13), running thence South 53 degrees 30 minutes east along Chesapeake Avenue approximately 66 feet; thence Northerly following Wayman Avenue to meet a line running South 53 degrees 30 minutes East which is an extension of the boundary between Lots 2 and 3, Block A; thence North 53 degrees 30 minutes West approximately 18 feet along this line to the East corner of Lot 2, Block A; thence South 38 degrees 20 minutes West 100 feet to the point of the beginning. Containing 4,650 square feet, more or less.

Same description as TRAC FD 2886-4005-4743 in Liber 9262, folio 521

Parcel 2:

All of that ground commencing for the same at the North corner of Lot 1, Block C, as per Plat of lots designated as Venice Beach in the Second Election District, Anne Arundel County on file in the Land Records of Anne Arundel County in the State of Maryland and designated as Plat 370 in plat Book 7, folio 13 (see also Plat 24, Plat Book 2, folio 20, Plat 120, Plat Book 3, folio 45), running thence South 36 degrees 30 minutes West approximately 86 feet to Oyster Lake; thence running Northwest along Oyster Lake approximately 25 feet to the boundary of Highland Beach; thence running North 35 degrees 59 minutes East to the Southwest side of Chesapeake Avenue; thence running South 53 degrees 30 minutes East to the point of the beginning. Containing 2,150 square feet, more or less.

Parcel 3:

All of that ground commencing for the same at the South corner of Lot 7, Block G as per Plat of lots designated as Venice Beach in the Second Election District, Anne Arundel County in the State of Maryland and designated as Plat 370 in Plat Book 7, folio 13, running thence North 36 degrees 30 minutes East 100 feet to the corner of Lot 6; thence running South 53 degrees 30 minutes East along Lot 6 to the Chesapeake Bay; thence in a Southerly direction along Chesapeake Bay to the inlet to Oyster Lake; thence North 86 degrees 53 minutes West along the channel from the Chesapeake Bay into Oyster Lake; thence Northerly along the shore of Oyster Lake to the West corner of Lot 8; thence South 53 degrees 30 minutes West to the point of the beginning.

Baltimore City County: Anne Arundel

Information provided is for the use of the Clerk's Office, State Department of Assessments and Taxation, and County Finance Office Only.
(Type or Print in Black Ink Only—All Copies Must Be Legible)

Space Reserved for Circuit Court Clerk Recording Validation

1	Type(s) of Instruments	<input type="checkbox"/> Check Box if addendum Intake Form is Attached.						
		<input checked="" type="checkbox"/> Deed Deed of Trust	<input type="checkbox"/> Mortgage Lease	<input type="checkbox"/> Other _____	<input type="checkbox"/> Other _____			
2	Conveyance Type Check Box	<input type="checkbox"/> Improved Sale Arms-Length [1]	<input type="checkbox"/> Unimproved Sale Arms-Length [2]	<input type="checkbox"/> Multiple Accounts Arms-Length [3]	<input checked="" type="checkbox"/> Not an Arms- Length Sale [9]			
3	Tax Exemptions (if applicable) Cite or Explain Authority	Recordation State Transfer County Transfer						
4	Consideration and Tax Calculations	Consideration Amount		Finance Office Use Only Transfer and Recordation Tax Consideration				
		Purchase Price/Consideration	\$ 0.00	Transfer Tax Consideration	\$			
		Any New Mortgage	\$	X () % =	\$			
		Balance of Existing Mortgage	\$	Less Exemption Amount	\$			
		Other:	\$	Total Transfer Tax	\$			
		Other:	\$	Recordation Tax Consideration	\$			
		Full Cash Value:	\$	X () per \$500 =	\$			
			TOTAL DUE	\$				
5	Fees	Amount of Fees	Doc. 1	Doc. 2	Agent:			
		Recording Charge	\$ 40.00	\$				
		Surcharge	\$ 20.00	\$	Tax Bill:			
		State Recordation Tax	\$	\$				
		State Transfer Tax	\$	\$	C.B. Credit:			
		County Transfer Tax	\$	\$				
		Other	\$	\$	Ag. Tax/Other:			
		Other	\$	\$				
6	Description of Property SDAT requires submission of all applicable information. A maximum of 40 characters will be indexed in accordance with the priority cited in Real Property Article Section 3-104(g)(3)(i).	District	Property Tax ID No. (1)	Grantor Liber/Folio	Map	Parcel No.	Var. LOG	
		02	886-90010756	29571/341	57	11		<input type="checkbox"/> (5)
		Subdivision Name		Lot (3a)	Block (3b)	Sect/AR (3c)	Plat Ref.	SqFt/Acreage (4)
		VENICE BEACH						
		Location/Address of Property Being Conveyed (2)						
		WAYMAN AVENUE						
		Other Property Identifiers (if applicable)					Water Meter Account No.	
		Residential <input checked="" type="checkbox"/> or Non-Residential <input type="checkbox"/> Fee Simple <input checked="" type="checkbox"/> or Ground Rent <input type="checkbox"/> Amount:						
		Partial Conveyance? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Description/Amt. of SqFt/Acreage Transferred:						
		If Partial Conveyance, List Improvements Conveyed:						
7	Transferred From	Doc. 1 – Grantor(s) Name(s)			Doc. 2 – Grantor(s) Name(s)			
		EDWARD S. COOPER, PERSONAL REPRESENTATIVE						
	Transferred To	Doc. 1 – Owner(s) of Record, if Different from Grantor(s)			Doc. 2 – Owner(s) of Record, if Different from Grantor(s)			
		ESTATE OF JEAN MARIE WILDER COOPER						
8	Transferred To	Doc. 1 – Grantee(s) Name(s)			Doc. 2 – Grantee(s) Name(s)			
		VENICE BEACH CITIZENS ASSOCIATION, INC						
		New Owner's (Grantee) Mailing Address						
	C/O HORTENSE FITZGERALD, 1403 CHESAPEAKE AVENUE, ANNAPOLIS, MD 21403							
9	Other Names to Be Indexed	Doc. 1 – Additional Names to be Indexed (Optional)			Doc. 2 – Additional Names to be Indexed (Optional)			
10	Contact/Mail Information	Instrument Submitted By or Contact Person					<input checked="" type="checkbox"/> Return to Contact Person.	
		Name: Anthony F. Christhilf					<input type="checkbox"/> Hold for Pickup	
		Firm: Anthony F. Christhilf						
		Address: 150 SOUTH STREET, Suite 205 ANNAPOLIS, MD 21401 Phone: (410) 269-6424					<input checked="" type="checkbox"/> Return Address Provided	
11	IMPORTANT: BOTH THE ORIGINAL DEED AND A PHOTOCOPY MUST ACCOMPANY EACH TRANSFER							
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Will the property being conveyed be the grantee's principal residence?							

PRT (Land Receipt) PD 2418, A-0250, MSA, CESS, 21561, Date available 07/17/2017, Printed 08/18/2017

CIVIL - NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: PLAINTIFF DEFENDANT **CASE NUMBER** 4
(Click to insert)

CASE NAME: Charles Riley, Jr. Revocable Trust, et al vs. Venice Beach Citizens Assoc. Inc.
Plaintiff Defendant

PARTY'S NAME: Charles Riley, Jr. **PHONE:** _____

PARTY'S ADDRESS: 3222 Wayman Avenue, Annapolis, MD 21403

PARTY'S E-MAIL: _____

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Wayne T. Kosmerl **PHONE:** 410-268-6600

PARTY'S ATTORNEY'S ADDRESS: 125 West St., 4th Fl., Annapolis, MD 21401

PARTY'S ATTORNEY'S E-MAIL: Kosmerl@CouncilBaradel.com

JURY DEMAND? Yes No

RELATED CASE PENDING? Yes No If yes, Case #(s), if known: _____

ANTICIPATED LENGTH OF TRIAL?: _____ hours 2 days

PLEADING TYPE

New Case: Original Administrative Appeal Appeal

Existing Case: Post-Judgment Amendment

If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

- | | | | |
|--|--|---|---|
| <p>TORTS</p> <ul style="list-style-type: none"> <input type="checkbox"/> Asbestos <input type="checkbox"/> Assault and Battery <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Conspiracy <input type="checkbox"/> Conversion <input type="checkbox"/> Defamation <input type="checkbox"/> False Arrest/Imprisonment <input type="checkbox"/> Fraud <input type="checkbox"/> Lead Paint - DOB of Youngest Plt: _____ <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Malpractice-Medical <input type="checkbox"/> Malpractice-Professional <input type="checkbox"/> Misrepresentation <input type="checkbox"/> Motor Tort <input type="checkbox"/> Negligence <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Specific Performance <input type="checkbox"/> Toxic Tort <input type="checkbox"/> Trespass <input type="checkbox"/> Wrongful Death <p>CONTRACT</p> <ul style="list-style-type: none"> <input type="checkbox"/> Asbestos <input type="checkbox"/> Breach <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Confessed Judgment (Cont'd) <input type="checkbox"/> Construction <input type="checkbox"/> Debt <input type="checkbox"/> Fraud | <ul style="list-style-type: none"> <input type="checkbox"/> Government <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability <p>PROPERTY</p> <ul style="list-style-type: none"> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Breach of Lease <input type="checkbox"/> Detinue <input type="checkbox"/> Distress/Distrain <input type="checkbox"/> Ejectment <input type="checkbox"/> Forcible Entry/Detainer <input type="checkbox"/> Foreclosure <input type="checkbox"/> Commercial <input type="checkbox"/> Residential <input type="checkbox"/> Currency or Vehicle <input type="checkbox"/> Deed of Trust <input type="checkbox"/> Land Installments <input type="checkbox"/> Lien <input type="checkbox"/> Mortgage <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Statement Condo <input type="checkbox"/> Forfeiture of Property / Personal Item <input type="checkbox"/> Fraudulent Conveyance <input type="checkbox"/> Landlord-Tenant <input type="checkbox"/> Lis Pendens <input type="checkbox"/> Mechanic's Lien <input type="checkbox"/> Ownership <input checked="" type="checkbox"/> Partition/Sale in Lieu <input type="checkbox"/> Quiet Title <input type="checkbox"/> Rent Escrow <input type="checkbox"/> Return of Seized Property <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Tenant Holding Over | <p>PUBLIC LAW</p> <ul style="list-style-type: none"> <input type="checkbox"/> Attorney Grievance <input type="checkbox"/> Bond Forfeiture Remission <input type="checkbox"/> Civil Rights <input type="checkbox"/> County/Mncpl Code/Ord <input type="checkbox"/> Election Law <input type="checkbox"/> Eminent Domain/Condemn. <input type="checkbox"/> Environment <input type="checkbox"/> Error Coram Nobis <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Mandamus <input type="checkbox"/> Prisoner Rights <input type="checkbox"/> Public Info. Act Records <input type="checkbox"/> Quarantine/Isolation <input type="checkbox"/> Writ of Certiorari <p>EMPLOYMENT</p> <ul style="list-style-type: none"> <input type="checkbox"/> ADA <input type="checkbox"/> Conspiracy <input type="checkbox"/> EEO/HR <input type="checkbox"/> FLSA <input type="checkbox"/> FMLA <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Wrongful Termination <p>INDEPENDENT PROCEEDINGS</p> <ul style="list-style-type: none"> <input type="checkbox"/> Assumption of Jurisdiction <input type="checkbox"/> Authorized Sale <input type="checkbox"/> Attorney Appointment <input type="checkbox"/> Body Attachment Issuance <input type="checkbox"/> Commission Issuance | <ul style="list-style-type: none"> <input type="checkbox"/> Constructive Trust <input type="checkbox"/> Contempt <input type="checkbox"/> Deposition Notice <input type="checkbox"/> Dist Ct Mtn Appeal <input type="checkbox"/> Financial <input type="checkbox"/> Grand Jury/Petit Jury <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Perpetuate Testimony/Evidence <input type="checkbox"/> Prod. of Documents Req. <input type="checkbox"/> Receivership <input type="checkbox"/> Sentence Transfer <input type="checkbox"/> Set Aside Deed <input type="checkbox"/> Special Adm. - Alty <input type="checkbox"/> Subpoena Issue/Quash <input type="checkbox"/> Trust Established <input type="checkbox"/> Trustee Substitution/Removal <input type="checkbox"/> Witness Appearance-Compel <p>PEACE ORDER</p> <ul style="list-style-type: none"> <input type="checkbox"/> Peace Order <p>EQUITY</p> <ul style="list-style-type: none"> <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Equitable Relief <input type="checkbox"/> Injunctive Relief <input type="checkbox"/> Mandamus <p>OTHER</p> <ul style="list-style-type: none"> <input type="checkbox"/> Accounting <input type="checkbox"/> Friendly Suit <input type="checkbox"/> Grantor in Possession <input type="checkbox"/> Maryland Insurance Administration <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Specific Transaction <input type="checkbox"/> Structured Settlements |
|--|--|---|---|

IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Summary | <input checked="" type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |
| <input type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment | |

If you indicated Liability above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- Liability is conceded. Liability is not conceded, but is not seriously in dispute. Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- Under \$10,000 \$10,000 - \$30,000 \$30,000 - \$100,000 Over \$100,000

- Medical Bills \$ _____ Wage Loss \$ _____ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)

A. Mediation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	C. Settlement Conference	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
B. Arbitration	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	D. Neutral Evaluation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

SPECIAL REQUIREMENTS

- If a Spoken Language Interpreter is needed, check here and attach form CC-DC-041
- If you require an accommodation for a disability under the Americans with Disabilities Act, check here and attach form CC-DC-049

ESTIMATED LENGTH OF TRIAL

With the exception of Baltimore County and Baltimore City, please fill in the estimated LENGTH OF TRIAL. (Case will be tracked accordingly)

- | | |
|--|---|
| <input type="checkbox"/> 1/2 day of trial or less | <input type="checkbox"/> 3 days of trial time |
| <input type="checkbox"/> 1 day of trial time | <input type="checkbox"/> More than 3 days of trial time |
| <input checked="" type="checkbox"/> 2 days of trial time | |

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- Expedited - Trial within 7 months of Defendant's response Standard - Trial within 18 months of Defendant's response

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES, JUDGES under Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.

Expedited - Trial within 7 months of Defendant's response **Standard** - Trial within 18 months of Defendant's response

IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY, PLEASE FILL OUT THE APPROPRIATE BOX BELOW.

CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

<input type="checkbox"/> Expedited	Trial 60 to 120 days from notice. Non-jury matters.
<input type="checkbox"/> Civil-Short	Trial 210 days from first answer.
<input type="checkbox"/> Civil-Standard	Trial 360 days from first answer.
<input type="checkbox"/> Custom	Scheduling order entered by individual judge.
<input type="checkbox"/> Asbestos	Special scheduling order.
<input type="checkbox"/> Lead Paint	Fill in: Birth Date of youngest plaintiff _____.
<input type="checkbox"/> Tax Sale Foreclosures	Special scheduling order.
<input type="checkbox"/> Mortgage Foreclosures	No scheduling order.

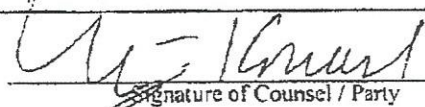
CIRCUIT COURT FOR BALTIMORE COUNTY

<input type="checkbox"/> Expedited (Trial Date-90 days)	Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus.
<input type="checkbox"/> Standard (Trial Date-240 days)	Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases.
<input type="checkbox"/> Extended Standard (Trial Date-345 days)	Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency.
<input type="checkbox"/> Complex (Trial Date-450 days)	Class Actions, Designated Toxic/Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

11/22/2019
Date

125 West St., 4th Fl.
Address

Annapolis MD 21401
City State Zip Code


Signature of Counsel / Party

Wayne T. Kosmicki (CPF#7302010002)
Printed Name