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February 17, 2015

Robert Bell, Architect
3218 O Street NW
Washington, D.C. 20007

RE: 1351 Wisconsin Avenue, N.W., (Lot 811, Square 1243)

Dear Mr. Bell:

I have reviewed the e-mail and documents provided by Mr. Mulder on behalf of himself, Bill Gallagher, Tom Adams and Caesar Junker. I have the following comments:

With regard to Mr. Adams claim to own part of Lot 811:

1. Your company, 1351 L.L.C., is the owner of lot 811 in Square 1243 by virtue of a Deed recorded August 7, 2014 as instrument 2014071742 (copy enclosed).
2. There is no evidence of record that Mr. Adams owns any part of lot 811. I handled the closing and examined the title. In fact, the Deed recorded at instrument 2002131779 from Tatiana S. Gau to Thomas L. Adams, Jr. describes lot 843 as running "Northeasterly along the said Southerly line of said Heon's conveyance to intersect the North line of said Lot 4". Heon's conveyance is lot 811. Lot 843 runs along the lot line and doesn't cross the lot line. Mr. Adams omitted the legal description from his submission.
3. Andrew Husbands, your surveyor, confirms that lot 806 is triangular and does not include any part of lot 811.
4. Mr. Adam's own survey of lot 843 prepared by Landtech Associates and provided to you by him (see attached), which was also omitted from his submission, confirms that there is no encroachment from lot 843 into lot 811.
5. The plat of lot 811 (see attached) shows that lot 806 was a small triangle at the rear of lot 843 and did not include any of lot 811.

With regard to Mr. Mulder's claim to own the sliver of land between the garage wall and Lot 68

6. The survey confirms that 1351 LLC own the sliver of land behind the garage that adjoins lot 68 – it is part of lot 811

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7. Mr. Mulder's "cottage" encroaches on lot 811
8. Mr. Mulder has not taken any legal steps to perfect his potential but not proven adverse possession claim to the sliver of lot 811 adjoining lot 68. If Mr. Mulder does take such legal action, I would recommend that 1351 L.L.C. vigorously oppose any such adverse possession claim.
9. There is no evidence on the Land Records that Mr. Mulder has any legal ownership to any part of lot 811.

Sincerely,

Robert W. Moses

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enclosures