

1 validity of the BERKELEY GRANT DEED in that the Plaintiffs maintain that the BERKELEY  
2 GRANT DEED is false and fraudulent and as a result thereof, is void *ab initio* and Defendants  
3 maintain that the BERKELEY GRANT DEED and their claim to the property is valid.

4 72. No adequate remedy other than herein prayed exists by which the validity of the  
5 BERKELEY GRANT DEED may be determined.

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7 **WHEREFORE**, Plaintiff prays judgment against Defendants, and each of them, as  
8 follows:

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**ON THE FIRST and SECOND CAUSES OF ACTION:**

- 10 1. That the BERKELEY GRANT DEED be declared void;  
11 2. That the BERKELEY GRANT DEED be ordered delivered up and canceled;  
12 3. For a determination and declaration of the notice and extent of each party's  
13 ownership interest in the PROPERTY;  
14 4. It is adjudged that the PROPERTY is the real PROPERTY of Plaintiff;  
15 5. That title be quieted in the name of Plaintiff;  
16 6. Defendant Prince Hall Arms be forever enjoined from asserting any claim  
17 whatsoever in and to the PROPERTY adverse to the Plaintiff;  
18 7. For damages, according to proof at trial;  
19 8. For exemplary and punitive damages according to proof at trial;

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**ON THE THIRD CAUSE OF ACTION**

- 21 9. For damages, according to proof at trial;  
22 10. For exemplary and punitive damages according to proof at trial;  
23 11. For attorney's fees, according to proof at trial;

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**ON THE FOURTH CAUSE OF ACTION:**

- 25 12. For damages, according to proof at trial;  
26 13. For exemplary and punitive damages according to proof at trial;

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**ON THE FIFTH CAUSE OF ACTION**

- 28 14. For damages, according to proof at trial;