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# Recent Developments: *Allen v. Ritter*: Maryland Estates and Trusts Section 9-111 Permits a Personal Representative Whose Final Account Is Approved by the Orphans' Court to Require Distributees to Sign Releases Prior to Estate Distribution

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## RECENT DEVELOPMENT

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### *ALLEN V. RITTER*

By: Sarah Witri

**MARYLAND ESTATES AND TRUSTS SECTION 9-111 PERMITS A PERSONAL REPRESENTATIVE WHOSE FINAL ACCOUNT IS APPROVED BY THE ORPHANS' COURT TO REQUIRE DISTRIBUTEES TO SIGN RELEASES PRIOR TO ESTATE DISTRIBUTION.**

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