

Circuit Court for Prince George's County  
Case No. C-16-CV-23-002067

UNREPORTED\*  
IN THE APPELLATE COURT  
OF MARYLAND

No. 126

September Term, 2024

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SANKA KAMARA

v.

DIANA THEOLOGOU, ET AL.

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Shaw,  
Zic,  
Eyler, James R.  
(Senior Judge, Specially Assigned),

JJ.

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Opinion by Zic, J.

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Filed: May 7, 2026

\* This is an unreported opinion. This opinion may not be cited as precedent within the rule of stare decisis. It may be cited for its persuasive value only if the citation conforms to Maryland Rule 1-104(a)(2)(B).

This case returns to us following a remand to the Circuit Court for Prince George’s County. In our first opinion in the same matter, *Sanka Kamara v. Diana Theologou*, No. 126, Sept. Term 2024, 2025 WL 1419465, at \*5 (Md. App. May 16, 2025), we stayed the appeal and remanded the case to the circuit court with instructions to clarify the court’s January 27, 2025 order (“2025 Order”) and the involvement of the magistrate in the court’s order overruling the exceptions (“2024 Order”).

On remand, the circuit court held a hearing and issued an order (“Exceptions Order”) concerning the 2024 Order. Subsequently, in an order entered on April 6, 2026, the court struck the 2025 Order. As explained below, we now dismiss Ms. Kamara’s appeal as moot.

### **BACKGROUND<sup>1</sup>**

In brief, the instant dispute stems from a residential foreclosure action. *Id.* at \*1. Ms. Kamara, a defendant in the underlying proceedings, appealed and presented one question for our review, which we rephrased as: “Whether the circuit court erred in ratifying the report of sale.” *Id.* We ultimately “remand[ed] for the [] court to clarify or modify as appropriate the 2025 Order and to clarify the magistrate’s involvement in the underlying proceedings.” *Id.* at \*5.

On remand, the court held a status hearing<sup>2</sup> and issued an order (previously, “Exceptions Order”) on January 9, 2026, which states in relevant part:

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<sup>1</sup> The underlying factual background and procedural history are set forth in detail in *Kamara*, No. 126, Sept. Term 2024, 2025 WL 1419465, at \*1-3.

<sup>2</sup> The transcript of the January 8, 2026 hearing was not provided to this Court.

The above-captioned matter came before the [c]ourt on January 8, 2026, for a [s]tatus [h]earing. [Sanka Kamara, appellant,] appealed after [the] parties did not receive the magistrate’s recommendation, thereby preventing them from filing exceptions. The Appellate Court remanded the matter for the [c]ourt to clarify or modify, as appropriate, the 2025 Order and to clarify the magistrate’s involvement.

[Ms. Kamara] did not appear. However, [Diana Theologou, appellee,] conceded that [neither of the original defendants]<sup>[3]</sup> receive[d] the original magistrate recommendation before this [c]ourt signed the [2024 Order]. Accordingly, having heard from the Appellate Court and upon review of the record, the [c]ourt finds that the parties did not receive the magistrate[’s] recommendation. *The [2024 Order] is to be considered as the magistrate recommendation.*

**ORDERED**, as per Maryland Rule 9-208(e), that [the original defendants] shall have [ten] days to file exceptions from the date of this order.

(Emphasis added.)

The court entered an order striking the 2025 Order on April 6, 2026. On the same day, the court transmitted the Exceptions Order and the order striking the 2025 Order to this Court. As of the filing of this opinion, Ms. Kamara has not filed exceptions (or any response) following the Exceptions Order.

## DISCUSSION

### I. MS. KAMARA’S APPEAL IS MOOT.

Pursuant to Maryland Rule 8-602(c)(8), we “may dismiss an appeal if[] . . . the case has become moot.” “An appeal is moot if, as a result of time or circumstances, ‘any judgment or decree the court might enter would be without effect.’” *Voters Organized*

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<sup>3</sup> Two individuals, Ifeoma Onyia and Ms. Kamara, were listed as defendants in the original foreclosure action. Ms. Onyia was not included as a party on appeal.

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*for the Integrity of City Elections v. Baltimore City Elections Bd.* (“VOICE”), 451 Md. 377, 392 (2017) (quotation omitted). “This Court’s role is to review judgments, not decide moot or academic questions.” *Estate of Brown v. Ward*, 261 Md. App. 385, 458 (2024). As such, moot appeals are generally dismissed. *VOICE*, 451 Md. at 392.

**A. The Exceptions Order Nullifies the Challenged Ratification<sup>4</sup>**

In the Exceptions Order, the circuit court found that the parties did not receive service of the magistrate’s recommendation and, as an apparent a remedy, gave Ms. Kamara an additional ten days, or until January 19, 2026, to file exceptions.<sup>5, 6</sup> Ms. Kamara did not file exceptions within the time provided.

From this Court’s understanding, the Exceptions Order nullifies the prior ratification of the sale by converting the 2024 Order to the magistrate’s report and

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<sup>4</sup> The circuit court’s order striking the 2025 Order states that the 2025 Order was entered in error. The 2025 Order, therefore, does not have any effect on the resolution of this appeal because it has been struck.

<sup>5</sup> For the sake of thoroughness, we recognize that this action does not exactly adhere to the instructions on remand. The circuit court’s transmissions to this Court do not “clarify the magistrate’s involvement in the underlying proceedings[,]” “explain why the magistrate’s signature is present on the 2024 Order[,]” or answer “whether the matter was referred to the foreclosure magistrate, and if so, by what mechanism. . . .” *Kamara*, No. 0126, Sept. Term 2024, 2025 WL 1419465, at \*5. As a result, we have no additional information about the involvement of the magistrate in the 2024 Order than when our 2025 remand was issued. Because Ms. Kamara has not objected (or otherwise responded) to the court’s actions on remand, however, we shall not consider this. *See Rollins v. Cap. Plaza Assocs., L.P.*, 181 Md. App. 188, 201 (2008) (explaining that this Court cannot be expected to seek out law or facts in favor of either party).

<sup>6</sup> As we understand the record, the only service of process issue raised by either party in the underlying proceedings related to service of the foreclosure complaint—not the magistrate’s recommendations. Again, because Ms. Kamara has not raised any issue with the Exceptions Order, we shall not address this. *See id.* at 201.

recommendations, thus starting anew from this point in the foreclosure process. Ms. Kamara’s challenges on appeal arise only from the order ratifying the sale. *See Kamara*, No. 126, Sept. Term 2024, 2025 WL 1419465, at \*2 (quoting Ms. Kamara’s specific contentions on appeal as challenging two aspects of the ratification); *see also, id.* at \*2, n.3 (explaining that the ratification, not the 2024 Order, is the judgment from which Ms. Kamara noted the instant appeal). Because the substance of Ms. Kamara’s present appeal is based on a now nullified ratification, her appeal raises questions that if resolved, would be of no effect. *See VOICE*, 451 Md. at 392. We, accordingly, exercise our discretion pursuant to Maryland Rule 8-602(c)(8) and dismiss this appeal.

**APPEAL DISMISSED; COSTS TO BE  
PAID BY APPELLANT.**