

APPELLATE COURT OF MARYLAND

Kim v. Parcel K-Tudor Hall Farm, LLC

Kim · No. No. 2483, September Term, 2023 · Decided March 5, 2026

SUMMARY

The Maryland Appellate Court held that an interpleader proceeding does not result in a final, appealable judgment until all claimants’ claims to the property or funds have been resolved. Because the investors appealed from the initial order directing interpleader while their claims remained pending, the court dismissed the appeal as premature and assessed costs against the appellants.

CASE DETAILS

COURT	Appellate Court of Maryland
WRITING FOR THE COURT	Nazarian, J.; Reed, J.; Wright, J.; Alexander, Jr., J. (Senior Judge, Specially Assigned)
JURISDICTION	Maryland
DECIDED	March 5, 2026
DOCKET	No. 2483, September Term, 2023
DISPOSITION	dismissed
PROCEDURAL POSTURE	Appellants sought to appeal an order of interpleader entered by the Circuit Court for St. Mary's County. The appellate court dismissed the appeal as premature because the order did not constitute a final judgment.
STANDARD OF REVIEW	De novo review of appellate jurisdiction and whether the order appealed from was a final judgment.
PRECEDENTIAL VALUE	published
PARTIES	Eun O. Kim, Kim's fellow investors v. Parcel K-Tudor Hall Farm, LLC

TOPICS

- interpleader
- final judgment rule
- appellate jurisdiction
- appellate procedure
- civil procedure

PRACTICE AREAS

- civil procedure
- appellate procedure
- real estate

QUESTIONS PRESENTED

1. Whether an order granting the first stage of an interpleader proceeding is a final, appealable judgment before the claimants' competing claims to the property or funds have been resolved.
2. Whether the appeal should be dismissed as premature under Maryland's final-judgment rule.

HOLDINGS

1. An interpleader proceeding does not become a final judgment until the last claimant's claim to the property or funds has been resolved and the second stage of the interpleader is complete.
2. Because the order of interpleader was not a final judgment and no applicable exception permitted an interlocutory appeal, the appeal was premature and had to be dismissed.

KEY QUOTATIONS

“Interpleader happens in two steps: first, the court orders the property at stake be given over to the court’s registry, and second, the claimants to the property litigate their claims.” (at 1)

“It has long been established in Maryland, even if not discussed recently, that interpleader does not become a final judgment until the last claimant’s claim to the property or funds is resolved and step two is complete.” (at 3)

FACTUAL BACKGROUND

Parcel K-Tudor Hall Farm, LLC owned a parcel of land known as Parcel K, while the investors held a subordinated deed of trust on the property. Because of the parties' complicated history, the LLC was uncertain how much it owed to redeem the lien, to whom payment was due, and in what proportions. It filed an interpleader action seeking a declaration of the parties' rights, payment of the proper amount into the court registry, and resolution of the deed holders' competing claims. The circuit court ordered the interim interpleader relief, but the claimants' rights to the deposited funds had not yet been adjudicated.

PROCEDURAL HISTORY

Parcel K-Tudor Hall Farm, LLC filed an interpleader and declaratory-judgment action concerning the amount and recipients of funds needed to redeem a subordinated deed of trust on Parcel K. On January 31, 2024, the circuit court entered an order granting interim interpleader relief and directing payment into the court registry. Although claimants began filing pleadings asserting rights to the funds, their claims remained unresolved and the circuit court stayed further proceedings pending the appeal. The Appellate Court of Maryland dismissed the appeal and directed that the circuit court resume the second stage of the interpleader proceeding.

DISPOSITION

dismissed

REMAND INSTRUCTIONS

The circuit court should resume the second stage of the interpleader and adjudicate the claimants' competing claims to the funds. The opinion does not expressly use a remand order, but directs that dismissal will allow the circuit court to resume step two.

CASES CITED

- Mayor & City Council of Balt. v. ProVen Mgmt., Inc., 472 Md. 642, 665 (2021)
- Gisriel v. Ocean City Bd. of Supervisors of Elections, 345 Md. 477, 485 (1997)
- Silbersack v. ACandS, Inc., 402 Md. 673, 678 (2008)
- Hopkins v. Easton Nat. Bank of Maryland, 171 Md. 130, 135 (1936)
- Union United Methodist Church, Inc. v. Burton, 404 Md. 542, 549-50 (2008)