

Earl H. Cline & Sons, Inc.,	:	No. 18389 Equity
a body corporate,	:	In the Circuit Court
vs.	:	For Frederick County,
Monocacy Motors, Inc.,	:	Maryland.
a body corporate.	:	In Equity.
	:	

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Earl H. Cline & Sons, Inc., a body corporate, respectfully shows unto your Honors:

1. That the Complainant is a body corporate of the State of Maryland, with its principal place of business near Frederick, Maryland, and is engaged principally in excavations, road building and industrial moving, and brings this suit in its own right as a creditor of Monocacy Motors, Inc., and on behalf of all other creditors of said Company who will come in and contribute to the expense of this suit.

2. That Monocacy Motors, Inc., Defendant herein, is a corporation duly incorporated under the laws of the State of Maryland, with its principal place of business at 615-17 North Market Street, Frederick, Maryland, and is engaged primarily in the sale of automobiles and trucks, holding a franchise for the sale of Dodge and Plymouth automobiles and Dodge trucks, and, in addition, operates a garage and repair shop at the address above mentioned.

3. That the said Defendant is indebted unto the Complainant herein in the sum of Forty-five Dollars (\$45.00) on account of work and materials sold and furnished in the usual course of business.

4. That to the knowledge of your Complainant, the said Defendant is indebted unto other creditors in an amount exceeding Sixty Thousand Dollars (\$60,000.00); that your Complainant is reliably advised, and therefore avers, that the operations of the Defendant have been conducted at a loss for many months; that the inventory of