

motor vehicles and automotive parts are depleted, and that the assets are currently being dissipated to the detriment of all creditors; that all avenues of credit have long been closed to the Defendant, and it is now without funds with which to continue further operations.

5. That your Complainant is reliably informed, and so avers, that the Defendant is insolvent, and that continued operations will result only in additional dissipation of assets to the further detriment of creditors; that some creditors of the Defendant have in recent weeks instituted proceedings in your Honorable Court and obtained judgment, thereby creating preferences to the detriment of your Complainant and other unsecured creditors; that your Complainant avers that it would be to the benefit of all creditors of the said Defendant to invoke the jurisdiction of your Honorable Court, to the end that the property and assets of the said Corporation, estimated to have a value not in excess of Fifty Thousand Dollars (\$50,000.00), may be administered by Receivers and an equitable and just distribution of the assets of said Corporation made without preference or priority.

WHEREFORE, your Complainant prays for the following relief:

(1) That a Receiver or Receivers may be appointed by your Honorable Court to take possession of and control and manage the property and assets of the defendant corporation, and for that purpose to appoint all necessary agents and employees to liquidate the used automobiles, trucks, inventory of automotive parts and garage equipment, collect all accounts and notes receivable capable of liquidation, and defend all suits in which the Defendant may be a party, subject to the Orders of your Honorable Court.

(2) That the proceeds of said liquidation coming into the hands of such Receiver or Receivers after the payment of all proper costs of administration may be distributed equitably among the creditors of the said Defendant.

(3) That the Defendant corporation, its officers, agents and employees may by writ of injunction be restrained from selling or disposing of any of the assets of said corporation or contracting any debts whatsoever on account of said corporation.