

3. That since your petitioner's mortgage is an equitable one, having been obtained by decree of this Court in Equity proceeding No. 20448, entitled Joseph L. Nellis, et al v. Allen Czarnowsky on the 16th day of December, 1964, there is, at present no trustee to effectuate the sale of the said property.

4. That Stanley B. Frosh, an adult citizen of the United States, a member of the Maryland State Bar, and a resident of the State of Maryland, residing at 6100 Bradley Boulevard, Bethesda, Maryland, is ready and willing to serve as trustee in this cause.

WHEREFORE, the premises considered, your petitioners pray:

1) That this Honorable Court pass an Order appointing the said Stanley B. Frosh as Trustee to foreclose the equitable mortgage of petitioners and to sell the same at public auction.

2) And for such other and further relief as to this Honorable Court may seem meet and proper.


B. C. Wimberly
State National Bank Building
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OL 6-7000
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Filed April 20, 1964