MARY V. MORGAN	*	NO. 24,292 EQUITY
Complainant	*	
v	*	IN THE CIRCUIT COURT
DONALD J. MORGAN	*	FOR FREDERICK COUNTY,
Respondent	*	MARYLAND

* * * * * * * * * * * * * *

COUNTERCLAIM

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Comes now Donald J. Morgan, Respondent, and for a Counterclaim to Complainant's Bill of Complaint for Partition, says:

FIRST: That the Complainant and the Respondent were co-owners of a restaurant business in Frederick City, Maryland, known as Morgan's Restaurant; that the assets consisted of equipment, supplies and good will.

SECOND: That in about 1970 the Complainant offered to buy Respondent's share of the business for the sum of $10,000.00.

THIRD: That based upon this offer, and Respondent's acceptance of the offer, the Respondent terminated his contact with the business, but left for the Complainant all the equipment and supplies necessary for operating the business.

FOURTH: That Complainant has failed to pay Respondent for his share of the business, and he is entitled to a division of this jointly owned business, and an accounting since 1970.

WHEREFORE, Respondent prays for the following relief:

1. That he be adjudged owner of one-half interest in Morgan's Restaurant.

2. In the alternative, that Respondent be awarded one-half the value of Morgan Restaurant.

3. In the alternative, that Respondent be awarded his equipment and supplies that are remaining on the premises of

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