

No. 5039 Equity

Naomi Utermohle Guardian of
Charles H Utermohle an infant
vs
Charles H Utermohle

No 5039 Equity
In the Circuit Court for Frederick County
Sitting as a
Court of Equity

To the Honorable the Judges of said Court

Your Petitioner Complaining respectfully shows

1. That she is the guardian of the said Charles H Utermohle who is an infant under the age of twenty one years
2. That said infant purchased certain real estate known as the Brongle Leno Kilns situated near Frederick City in Frederick County at and for the sum of Forty two thousand dollars, as will appear by reference to a certified copy of the report of sales filed in the Orphans Court of Frederick County herewith filed marked Exhibit A. and which is prayed to be taken as a part hereof as fully as if herein at large in words and figures set forth.
3. That by reason of the fact that funds held by your petitioner as guardian of said infant are invested elsewhere beyond the jurisdiction of this Court and cannot be converted into money without great sacrifice and loss, it is necessary in order that said purchase money may be paid that money be borrowed on mortgage on said Leno Kilns
4. That said infant cannot pay said purchase money without sacrificing other investments unless the purchase money or a large part of it can be raised by mortgage on said property
5. That said property known as the Brongle Leno Kilns is valuable and it will be to the interest and advantage of said infant to retain and hold the same and to pay for it by raising the purchase money on mortgage as aforesaid
6. Your petitioner prays for the following relief
 1. That a summons may issue addressed to the said Charles H Utermohle requiring him to appear to this Bill
 2. That a decree may be passed authorizing and empowering your petitioner as guardian to mortgage said Leno Kiln property for the purpose of raising sufficient money to pay the purchase money due thereon
 3. That she may have such other relief as may be equitable and right

And as in duty bound - Naomi Utermohle Guardian

J. M. Shury
Solicitor

of Charles H Utermohle

Filed January 16th 1885.