No. 6881 Equity.

Bill of Complaint.

of land as also certain valuable property in Frederick City, all of which will more fully appear by reference to the deed of conveyance from Charles W. Rock and William P. Maulsby Jr. Trustees to Plaintiff duly recorded in Liber No. folio one of the Land Records for Frederick County.

3rd. That for the purpose of conducting said business Plaintiff likewise bought a large number of mules carts wagons tools and some store goods, a greater part of which as also the real estate heretofore mentioned the plaintiff still owns.

4th That the active management of its business was entrusted to a certain Thomas Gorsuch who was one of the largest stock-holders of Plaintiff and had been the promoter of the whole business for which Plaintiff was formed.

5th That the said Gorsuch immediately upon formation of Plaintiff took entire charge of the business of Plaintiff not only in the details of carrying on the furnaces but also in the finances and general management of the business in every way and in every department.

6th That the said Gorsuch continued such control & management of Plaintiff and its affairs up to his death in the Summer of 1896.

That during these years the conduct of the business had not been profitable, on the contrary in the effort to continue the business and in the effort to keep the Furnaces going with a view to an advantageous sale, large debts were incurred which are still outstanding and unpaid.

8th That said debts were incurred and the money which was produced from said debts, was produced and incurred very largely from the personal means of the said Thomas Gorsuch and from the weight and influence which his character and standing enabled him to exert in this community and among the stock-holders, of Plaintiff, as will appear when it is learned that the debts of Plaintiff are about $50000 of which about $26000. is due to the estate of Thomas Gorsuch while about from $7 to $10,000. of said debts are due to a certain George Houck beside the very large holding of stock held by said Houck and the estate of said Gorsuch, while almost all of the remainder of the debts are due to people who loaned their money or credit to Plaintiff on account of said Thomas Gorsuch and their faith in his Judgment and capacity.

9th That since the death of said Gorsuch the Furnaces have been idle, the present management of the Plaintiff being without the means to conduct the business, and being utterly unable to command the same, while at the time they have no person in whose skill and Judgment to manage the business, they have any confidence nor have they the means to procure such a person, not the cash or the credit to enable him to develop the business, even if they had at hand such a person.

10th That in addition to the facts hereinbefore mentioned the duty to wind up the estate of said Thomas Gorsuch and the needs of the other creditors of Plaintiff make it imperative that there should be a payment of the debts of Plaintiff and to that end and as the only means that Plaintiff has to make such payment that there should be a winding up of the affairs of Plaintiff and sale of its property and a dissolution of Plaintiff by your Honorable Court.

11th. That to this end after ten days notice as required by the by-laws of Plaintiff a special meeting of the stock-holders of Plaintiff was called for Monday the 2nd day of May 1898, that in conformity with said call said meeting assembled.