No. 8013. Equity.

Holmes agreed to become a Stockholder in said Company and through the promises made to your orator and said Shekran that he would mortgage his home and raise the sum of Three thousand dollars ($3000.00) thirty (30) shares of the stock of the said Builders' Supply Company, of the par value of one hundred dollars each, were issued and given to said Holmes. but said Holmes has failed to pay for such stock or any part thereof. That your orator paid for ten shares of the capital stock of said Corporation and said Daniel M. Shekran subscribed and paid for (30) shares of the stock of said Corporation of the par value of one hundred dollars ($100) each, and they are still the holders of said stock. That said Corporation organized by the election of officers and elected said Daniel M. Shekran President and adopted a set of by-laws. At the first meeting of the directors of said Corporation the defendant of Gilmore D. Holmes, was elected Assistant Treasurer and Manager for said Company in the District of Columbia, and has been acting as such and continues to so act. That as such Manager he has entire charge of the books of account of said Corporation and of the Stock Books and Contracts, and has power to sign checks on the depository of said Corporation, the American National Bank, of the City of Washington, District of Columbia. That your orator, who is also Vice-president of said Corporation, and the said Daniel M. Shekran, President aforesaid, have repeatedly demanded the right to see the Books of said Corporation from said defendant Holmes, and also a statement of the account of the affairs of said Corporation to each and every one of which requests the said Holmes has refused. That under Section 29 of the incorporation laws of the State of Delaware, every stockholder shall at all times during the usual hours of business have the right to examine the Books of said Corporation. That said defendant Holmes has not only refused your orator the right to inspect said Books but has threatened to knock them up before he would deliver them or grant the inspection requested.

4. That said defendant Holmes, in his capacity as Manager, has entered into contracts in his own name from which he has reaped large profits and from which he has not accounted to said Corporation, but he claims they are his individual contracts and that said Company is not entitled to any participation therein. That from information and belief your orator avers that there are a number of outstanding contracts entered into by said