No. 8862 Equity.

Second Mortgage bonds, and it is impracticable by mortgage or giving the defendants property as security to raise further money as required to pay running expenses. And Complainants are advised that the only practicable method of protecting themselves and other stockholders and other creditors is to secure a receiver appointed by this Court to take charge of the affairs and property of the defendant, and to manage and operate the business of the defendant and under the direction of the Court for the benefit of all parties concerned; and they are informed and believe that if a receiver is appointed to take charge of and manage the business and affairs of the Company the the profits to be derived from said business will probably be sufficient to cancel the indebtedness of the defendant and prevent a sacrifice sale of its property and save said property to the stockholders.

Wherefore the premises considered, the Complainants pray as follows:—

1. That a writ of subpoena may be issued out of this Court directed to the defendant, Baltimore & Washington White Cross Milk Company, directing it to appear in Court, on a day certain and answer the exigencies of this bill.

2. That receivers may be appointed to take possession of all of the property and assets belonging to the defendant, and to control, conduct, manage and operate all of its business affairs within this jurisdiction under the direction of this Court, and that all decrees and orders may be passed that may be necessary and proper in the premises.

3. That the net profits derived from said business after paying the expenses of operating and conducting the same and all other costs and charges, may be applied by said receivers to the payment of the indebtedness due by the defendant to all other persons who shall make themselves parties to this proceeding.

4. That in the event said net profits should prove insufficient to discharge the said debts, said receivers may be authorized to sell the property and assets of the defendant and pay the debts of the defendant out of the proceeds of said sale.

5. That they may have such other and further relief as the nature of the case may require and as to the Court may seem meet and proper.

6. The defendant to this bill is the Baltimore & Washington White Cross Milk Company.

Thomas Ruffin, Douglas Baker, Ruffin and Otey, Solicitors

Frank B. Scott,
Geo. C. L. Crenshaw