No 8862. Equity.

Shows unto your Honors:-

First: That in accordance with the order of your Honorable Court passed on the 22nd. day of November A.D. 1912. they have accepted the offer of George M. Oyster Jr. of Twenty Seven Thousand Dollars. ($27.000). for all of the assets of the Baltimore and Washington White Cross Milk Company situated in Washington D.C., Frederick County, Md., and elsewhere, with the exception of the Cash and cash items on hand and the bills and accounts receivable, subject to final ratification by your Honorable Court on December 16th. 1912.

Second: That, in addition to the real estate of the said Baltimore and Washington White Cross Milk Company, which is the subject of said tentative sale, a valuable asset of said Company which said Purchaser expects to obtain as a part of said assets of the Company is the good will and business of the said Company, which consists of a large number of Milk Customers in Washington City, who are supplied from Milk furnished by numerous Farmers in Frederick County.

Third That in order that the assets of the said Baltimore and Washington White Cross Milk Company and especially the Good will and business thereof, may be preserved, it is essential to the interests of all parties having an interest in the said property or the proceeds thereof that said business be continued by your Receivers until the date set for the ratification of the sale: and that, in order to continue said business, it will be necessary for your receivers to borrow a sum of money in order to pay promptly the farmers and other persons furnishing your Receiver with milk to operate said plant, and to pay other expenses to the running of its business.

Fourth: Your petitioners have now overdrawn their bank account at the Central National Bank, of Frederick the sum of Two Thousand, Five Hundred and Thirty Dollars, and Thirty Seven Cents. ($2.530.37) occasioned by checks principally to persons furnishing said plant with milk, and now owe for milk and cream up until Thursday, the 28th. day of November, Two Thousand and Twenty-seven Dollars and one Cent. ($2.027.01). and besides your petitioners will be obliged to furnish money for pay Roll necessary to operate said plant, aggregating a considerable sum.

Fifth: Your Petitioners represent that they have from Ten to Twelve Thousand Dollars, worth of Bills receivable eighty per cent. of which at least should be collectible, which bills receivable consist principally