

No 899, Equity.

Petition of John H.  
Baker, Trustee, et al

Filed Apr 7 1910.

To the Honorable, the Judges of Said Court  
This the Petition of John H. Baker Trustee, in the  
above entitled Cause, respectfully sheweth your  
Honors:-

1st. That the Said John H. Grimes and Laura A.  
Grimes his wife, being Citizens of Frederick County, Mary-  
land, being unable to pay all of their debts in  
full, did by their deed of Trust, assign and  
transfer all of their property unto him, as in Said  
deed set forth, a Certified Copy of which is filed in  
these proceedings, in your Honorable Court.

2nd. That your Trustee and Petitioner accepted Said  
Trust reposed in him, and your Honorable Court,  
by its order assumed jurisdiction of said Trust,  
and estate of said Grantors assigned to your  
Petitioner, as appears by your order on file in  
these proceedings, bearing date on the 28th. day  
of March, A.D. 1913. - after said Trustee filed his duly  
executed Bond in the sum of Four Thousand Dollars.

3rd. That the property of which said Grantors assigned  
and transferred by said deed of trust, consisted of  
real estate, Personal property, and mixed property, as  
therein set forth; And your Petitioner has Said Real  
Estate and Personal property advertised, but has not  
been able to possess himself of all the personal prop-  
erty of said Grantors yet he has made several efforts  
to do so. He said Grantor has in his possession notes  
of some of his Creditors, and refuses to deliver them  
to your Petitioner, has in his possession money as he has  
heretofore said amounting to many hundred Dollars,  
as well as your Petitioner is of the belief, that a  
considerable of the Fire Insurance money, received  
by him on the 20th. day of May 1912, to-wit: the  
sum of \$1,515.00/100c. is yet in his possession, or placed  
beyond the reach of your Petitioner.

4th. Your Petitioner further says that when he called  
upon said Grantors, for all notes, money, accounts etc. said Grantors,  
bold of claims due him, such of them as was not collectible,  
or by mere chance of getting them, but claims that were good  
and collectible, he did not deliver to your Petitioner (and said  
Grantors Trustee) but have since making said deed of  
assignment, gone around and among his Creditors,  
collecting the Bills due him, and expending the same,  
at the same time, denying any right that your Petitioner  
has to the money collected by him.

5th. Your Petitioner therefore prays your Honorable Court