

NO. 899. Equity.

upon said Grantors for all notes, money, accounts, etc. said Grantors hold of claims due him, such of them as was not collectible, or by mere chance by letting them, but claims that were good and collectible, he did not disclose to your Petitioner (and said Grantors Trusts) but have since making said deed of Assignment gone around among his Creditors, collecting the Bills due him, getting 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 to pass an order upon this his Petition ordering and directing said John W. Grimes and Laura A. Grimes, his wife, to be and appear in your Honorable Court, on some day, to be named by your Honorable Court, and show cause, if any be, and she may have why they should not turn over unto your Petitioner all money now in their possession, or in the possession of either of them, as well as all notes now in the possession of them or either of them, as well as to pay over all sums of money collected by them or either of them since making said deed of Assignment unto your Trustee, and petitioner as well as inform your petitioner of any property he has not been given information of in possession of said grantors, or either of them, etc. And your Petitioner will ever pray etc.

John W. Baker,

Petitioner.

Geo L. Stockdale,

Solicitor for Petitioner.

State of Maryland, Carroll County, To-wit:-
I hereby Certify, That on this 4th day of April, in the year Nineteen Hundred and Thirteen, before me, the Subscriber a Notary Public of the State of Maryland, in and for Carroll County, aforesaid, personally appeared John W. Baker, Petitioner and Trustee, as herein fully set forth, and made oath in due form of law, that the matters, facts and things stated in the foregoing petition, are true as therein set forth to the best of his knowledge and belief.

Given to before
Milton D. Reed

Notary Public

