Petition & Affidavit and Courts Orders Thereto

The Central National Bank, a body corporate etc. VS. Emory L.Coblentz et al.	:::::::::::::::::::	No. 8269 Equity. In the Circuit Court for Frederick County, in Equity sitting.

To the Honorable Judges of said Court:

The petition of Michael F.Seachrist, respectfully represents unto your Honors:

1. That on the 14th, day of February, 1908, the Complainant, in the above entitled cause, filed a Bill of Complaint therein, for the purpose of having certain Real Estate, therein mentioned and described, sold.

2. That the property, which the Complainant desires to be sold, was the property of one Augustus H.Ebert, a bankrupt, as therein alleged.

3. That your petitioner is a large and bona fide creditor of the said Bankrupt and has not been made a party to this cause, although he is advised, and so charges, that he is ehtitledto be made such.

3 1/2 That your Petitioner, is informed and verily believes and so charges, that the trustees, or rather two-the majority-of them-to-wit: Emory L.Coblentz and Charles C.Waters, will not protect and subserve his interests, as well as that of the other creditors of the said Bankrupt estate.

4. That your petitioner is advised, believes and so charges that the said trustees will not contest and question the right of the Complainant to the relief for which it seeks, which will be, your petitioner, charges detrimental to his interest and those of the other creditors.

5. That thereis certain defences namely (2)that the indebtness intended to be secured by the mortgage has been discharged by operation of law, (1) That the Central National Bank has no right to grant on this suit which your petitioner desires to interpose to the granting of the prayers of the said Bill of Complaint, and that the trustees will not introduce these defences nor urge the objections which we your petitioner wishes to establish in this cause.

6. That these said defenses are matorious ones and to prevent their interposition would result in a great hardship and irreparably injury to your petitioner and the other creditors in this cause.

7. That your petitioner is advised that he is entitled as a matter of right, to be made a party defendant to these proceedings and permitted to enforce his rights and mantain his defenses.

To the end therefore,

1. That your petitioner, the said Michael F.Seachrist, may be made a party defendant to these proceedings, for the purposes set forth in this petition.

2. That he may have all such futher and futher relief as the nature of his case may require, And as in duty etc.,

Michael F.Seachrist.
Petitioner.

Stoner & Weinburg
Solicitors for Petitioner.

State of Maryland, Frederick County, Sot:

I hereby certify that on this 18th day of February A.D.1908, before the subscriber, the Clerk of the Circuit Court, for Frederick County, personally appeared Michael F.Seachrist, the above-named petitioner, and made oath, in due form of law that the mAtters and things stated in the aforegoing petition are true to the best of his knowledge and belief.

Samuel T.Haffner
Clerk of the Circuit Court for Frederick County.

The foregoing petition and affidavit having been read and considered by the Court; it is thereupon, this 19th, day of February A.D.1908, by the Circuit Court