

Died and on the 29th, day of January A.D. 1881 Joseph Wood was appointed Trustee in his place by order of your Honorable Court filed in this case. (7) That said Joseph Wood executed his bond as such Trustee and entered upon the execution of the trusts created by said deed, and received the Real Estate. (8) That upon the application of your petitioner Vernon W. Dorsey as next friend of said Marriott M. Dorsey and Emily E. Dorsey, by his will of complaint filed in No. 5086 Equity in your Honorable Court, the said Joseph Wood as Trustee was by decree of your Honorable Court, passed on the 5th, day of July A.D. 1885, and managed to raise the sum of fifteen hundred dollars by mortgage upon said Real Estate for the purpose of raising funds to live and improve said land as will more fully appear by reference to the proceedings in said No. 5086 Equity now remaining in your Honorable Court and to which reference is specially made as prayed to be considered as part hereof as fully as if here inserted in words and figures, (9) That by the said Decree in said No. 5086 Equity, the said Joseph Wood as Trustee was authorized to expend the said finances to be raised by mortgage as aforesaid in liening and improving said land only and he was further ordered to make a detailed report of his expenditures of said sum of money together with his vouchers for such expenditures. (10) That said Joseph Wood, as Trustee, Die, upon the 7th, day of July A.D. 1885, borrow from the Franklin Savings Bank of Frederick the sum of Fifteen Hundred Dollars and did execute a Mortgage for said amount, of the said Trust Estate, the said Franklin Savings Bank, but he has not made any report to your Honorable Court of the expenditures of said money as required by said Decree. (11) That said Joseph Wood, as Trustee, has never made any report to your Honorable Court of the manner of which he has discharged his said Trust, nor has he ever stated an account thereof. (12) That upon the 15th, day of September A.D. 1886, your Petitioner Vernon W. Dorsey filed his petition in this case asking that said Joseph Wood might be required renue an account of the execution of his said Trust and that he might also be required to execute and file another Bond for the faithful execution of his trust as will appear by said Petition now specifically referred to and prayed to be taken as part of this. (13) That upon said Petition your Honors passed an order requiring said Joseph Wood to answer said Petition and show cause on or before the 7th, day of October then next why the prayers of said petition should not be granted. Provided a copy of said petition and the said order of your Honorable Court should be served on said Joseph Wood Trustee on or before the 23rd, day of said September as will fully appear by said order filed in this case. (14) That a copy of said Petition and order was served upon said Joseph Wood, Trustee, before said 23rd day of September, by Luther C. Derr, Sheriff, as will appear by said copy and the Sheriff returned thereon filed in this Court on the 20th, day of September A.D. 1886. (15) The said Joseph Wood, Trustee, paid no attention to the said order of your Honorable Court, and did not answer said Petition or show cause why its prayers should not be granted, nor has he rendered to your Honorable Court any account of the execution of his said Trust nor has he filed any new Bond, but has wholly disregarded and disobeyed both said orders of your Honorable Court of 15 September 1886, filed in this case and said decree of July 6th, 1885 filed in said 5086 Equity. (15) That the present Bond of said Joseph Wood Trustee, is not ample and sufficient. (17) That your Petitioner has reason to believe and do charge that said Joseph Wood as Trustee has not faithfully executed his said trust, Wherefore your Petitioner prays. (1) That said Joseph Wood, Trustee, may be required by order of your Honorable Court to forthwith renue to this Court an account of the execution of his said trust. (2) That since Joseph Wood, Trustee, may be required to renue an account wherein he shall charge himself with all moneys by him received by him as Trustee, both from the Estate of the former Trustee one from the rents issues and profits of said Real Estate as well as the money he borrowed upon the execution of said Mortgage, and that he shall also be required to furnish a detailed statement of the manner in which he has expended the money so received with proper vouchers for such expenditures. (3) That said Joseph Wood may be removed from his said Trusteeship and some other and more suitable person appointed in his place. (4) That your Petitioner may have all such other and further relief to which they may be entitled and to your Honors shall seem just. And they will now pray &c.

Chas T. Reifsnider
Milton G. Urner

Solicitor for Petitioners