

appointed in this cause under the decree of this Honorable court, and that out of the money arising from the sale thereof, after the payment of all costs and expenses properly allowed against the proceeds, to apply the balance of said proceeds then remaining to the payment of the bonds secured by said first mortgage and of the interest accruing and unpaid thereon.

2. That the receivers appointed by this Court be directed to hold and apply the income and receipts from said property for the interest and benefit of the bondholders, as provided in said deed of trust, and by the orders of this court, and that the defendant be decreed to make such transfer and conveyance to your petitioner and to the purchaser or purchasers at the sale or sales of said property as may be made in conformity with the provisions of said mortgage and under such decree of this court as may be necessary and proper to put the purchaser or purchasers in possession of the property so purchased.

3. That if upon foreclosure and sale of said property aforesaid the same shall fail to realize as sum sufficient to pay the amounts of said bonds and interest thereon, that petitioner may have judgment against the defendant Company for any deficiency there may be in the payment thereof.

4. And for such other and further relief as the circumstances of the case may require and as the court may seem necessary and proper.

CONTINENTAL TRUST COMPANY OF THE DISTRICT OF COLUMBIA.

C.W. Warden.
Vice-President.



ATTEST: M.J. Winfree
Secretary.

DISTRICT OF COLUMBIA, SS:

CHARLES W. WARDEN, being duly sworn, says that he is the Vice-President of the Continental Trust Company; that he has read the foregoing petition by him subscribed as such Vice-President, and knows the contents thereof; that the matters and things therein stated of his own knowledge are true and those therein stated on information and belief he believes to be true; that the reason this verification is made by him is because the petitioner is a corporation.

C.W. Warden.



Subscribed and sworn to before me this 17th day of October, 1916.

H.L. Offett
Notary Public, D.C.

Filed October, 18-1916.

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND.

Frederick Mertens, et al, Trading
as F. Mertens' Sons, Plaintiffs

Equity No. 9457

vs.

White Cross Milk Company, et al,
Defendants,

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PETITION OF WILLIAM L. BROWNING AND CHARLES McC. MATHIAS ANCILLARY RECEIVERS OF THE WHITE CROSS MILK COMPANY, INCORPORATED.

The Petition respectfully shows to the Court as follows:

1st. By an order of this Court passed herein on the 27th day of April 1916, your petitioners, William L. Browning and Charles McC. Mathias, were appointed ancillary receivers of the property and assets within the State of Maryland of the White Cross Milk Company and were authorized and directed to take possession of the said property and assets and to continue the operation of the business of defendant company and systematically continue the milk business and occupation of the defendant company and all other business of the defendant company in accordance with an order issued by the Supreme Court of the District of Columbia appointed William L. Browning receiver of the assets and property within the District of Columbia, the White Cross Milk Company, dated the 27th day of April, 1916.

2nd. That in accordance with said order of appointment your said receivers were duly qualified and took charge of the property and assets of the said defendant company and have been from time to time until the present operation the business of the said company.

3rd. That it has become necessary for your petitioners in order to continue the said business to ask for permission to borrow money upon receivers' certificates to the extent of Four Thousand Dollars (\$4,000.) which shall be a prior lien over the mortgage indebtedness of the defendant