

or of the Company, the total indebtedness of the Company, including the bond issue aforesaid, being about Five Hundred and Ten Thousand Dollars (\$510,000), Part of the difference between the amount the the defendants owes your complainant, both for money advanced and guaranteed, is made up of the outstanding bond issue, pledged as collateral, as above stated and secured by invoices of the Company duly assigned and filed with the creditors holding these obligations.

8. That, as heretofore stated, the Company is actively engaged in the manufacture of its products, but it has no money with which to meet the current payroll, nor the means to buy the material necessary to carry on its business; that some of its creditors of the Company are pressing for payment, and your complainant, as the largest creditor, feels that the only way to save the Company and preserve its assets for the benefit of its creditors and stockholders is by the appointment of a receiver by this Court with proper authority and power to continue the operations of the Company as a going concern, collecting its assets, and under the further direction of the Court to carry out its contracts, and if deemed advisable to consummate the proposed sale of the Company.

Wherefore the complainant prays:

1. That a receiver or receivers may be appointed to take possession of, hold, control, and manage the property and assets belonging to the defendant within the jurisdiction of this court, and for that purpose to appoint all necessary agents and attorneys, that may be necessary, to collect all outstanding accounts and bills receivable, and to prosecute and defend all suits in which the defendant may be interested.
2. That the said receiver may be authorized and directed under the order of this Court to continue the business of the defendant Company as a going concern until the further order of the Court in the premises, and to borrow money on receivers' certificates for that purpose.
3. That all persons may be enjoined from interfering in any way with the possession and operation of said property by said receiver.
4. That out of the revenues coming into the hands of such receiver, after the payment of all just debts and expenses, the indebtedness due to your complainant and others who may become parties to these proceedings may be paid.
5. That your complainant may have such other and further relief as he is entitled to in the premises. To which and your complainant prays that process may be issued to the defendant to appear and answer the exigencies of this bill.

Emory L. Coblenz, Douglass, Osbear, Douglass.
Bates Warner, Solicitors for Complainants.

John Mitchell Jr.

District of Columbia, SS!

JOHN MITCHELL, Jr., being first duly sworn on oath says that he has read the foregoing bill of complaint by him subscribed and knows the contents thereof; that the matters and things therein stated as of his personal knowledge are true, and those things stated upon information and belief he believes to be true.

John Mitchell Jr.

Subscribed and sworn to before me this 11th day of November, 1916.



(Filed Nov, 20, 1916)

Gertrude Ellis
Notary Public. D.C.

IN THE CIRCUIT COURT FOR FREDERICK COUNTY MARYLAND.

John Mitchell, Jr.,
Complainant,

vs.

Morris Iron & Steel Company, a Corporation,
Defendant.

Number 9 5 4 4.

Answer of the Defendant Morris Iron & Steel Company.

This defendant for answer to the bill of complaint in the above entitled cause says:

1 & 2. He admits the allegations of the first and second paragraphs of the said bill in regard to the residence of the plaintiff, the incorporation of the defendant, and the purposes for which the