

Farmers & Mechanics National
Bank of Frederick and Mattie
J.B.Ford,

Vs.

The O.J.Keller Lime Company,
a corporation duly incorporated
under the laws of the State of
West Virginia.

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No. 11940 EQUITY.
In the Circuit Court
for Frederick County.

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TO THE HONORABLE JUDGES OF SAID COURT:-

The Bill of Complaint of Farmers & Mechanics National Bank of Frederick and Mattie J.B.Ford, respectfully represents unto your Honorable Court;

FIRST; That the Complainants are residents of the State of Maryland and bring this suit in their own right as creditors of The O.J.Keller Lime Company, and on behalf of the other creditors of The O.J.Keller Lime Company who come in and contribute to the expenses of this suit.

SECOND; That the Defendant, The O.J.Keller Lime Company is a corporation duly organized under the laws of the State of West Virginia, has its principal office place of business at Buckeystown, Frederick County, Maryland, and its office in Frederick, Maryland.

THIRD. That the Defendant corporation, The O.J.Keller Lime Company is indebted to your Complainant, the Farmers & Mechanics National Bank of Frederick in the following sums; \$1000.00 by its promissory note now ~~ef-even-date~~ over due, dated March 31, 1928, and marked Exhibit # 1, \$860.00 by its promissory note now over due, dated April 24, 1929, and marked Exhibit # 2, \$1000.00 by its promissory note now over due, dated March 15, 1928, marked Exhibit # 3, \$1500.00 by its promissory note now over due, dated February 18, 1928, marked Exhibit # 4, \$800.00 by its promissory note, dated June 1, 1929, marked Exhibit # 5; \$15,800.00 by its promissory note now over due, dated January 1, 1929, marked Exhibit # 6, upon which the payment of \$700.00 has been made, totalling \$20,260.00; and the sum of \$9,500.00 due the Complainant, Mattie J.B.Ford, by its promissory note now over due, dated the 3rd day of June, 1922, marked Exhibit # 7, and the sum of \$4000.00 due to Complainant Mattie J.B.Ford by its promissory note now over due, dated March 6, 1922 marked Exhibit # 8,

FOURTH; That your Complainants are the two largest creditors of the Defendant and other creditors, to your Complainant's knowledge, having claims totalling about \$13,000.00.

FIFTH; That your Complainants are advised by the officers of the Defendant corporation that for the past year Defendant corporation has been operating at a loss and that due to said losses the said Defendant is hopelessly insolvent and is not able to continue this operation without additional working capital without great loss and injury to its creditors.

SIXTH; That Complainants are apprehensive that some of the subsisting creditors will institute proceedings in Court looking to the recovery of their claims and thereby creating a preference to the detriment of your Complainants and thereby forcing said corporation into insolvency and your Complainants sharge and believe that it would be more beneficial to all the creditors to invoke the jurisdiction of your Honorable Court and have the property of said corporation administered by receivers, whereby there can be a just and equal distribution of the assets of said corporation among the subsisting creditors without preference or priority.

SEVENTH ; That the property of said corporation consists of a farm in Frederick County, containing about one hundred fifty acres of land, improved with a farm house, barn and other out buildings, dwelling house in Buckeystown, and fully equipped Lime plant with modern hydration building and plant, and other necessary improvements and equipment used in the operation of said plant, which deed is dated the ____ day of ____ 19__ and recorded in Liber D.H.H.# 5, Folio 72, on of the Land Records of Frederick County, a certified copy of said deed to said property is filed herewith marked Exhibit # 9, Also a farm and improved with farm buildings and several dwelling houses and store room located at Engles, State of West Virginia, and containing in the