

aggregate about one hundred sixty acres of land, and located along the Baltimore & Ohio Railroad.

EIGHTH; The Complainants are advised that there are outstanding bills receivable of various corporations and individuals due the Defendant corporation aggregating about \$8000.00 which should be collected and administered as part of the assets of said corporation.

NINTH; That your Complainants believe that the only way to preserve the corporation's assets is by the appointment of a receiver by your Honorable Court with proper authority and power to continue the operations of the corporation as a going concern in order to receive the best price obtainable therefore with ^{proper} power and authority to collect its assets under the direction of your Honorable Court and to carry out its contracts and complete its unfilled orders and to continue the operations of said corporation until such time as said property could be sold advantageously.

TENTH. That your Complainants have been informed by the officers of said Defendant corporation that because said Defendant corporation is unable to meet its future payroll that it has decided to close down and suspend operations at an early date.

WHEREFORE Your Complainants pray for the following relief;

1st. That a receiver may be appointed by your Honorable Court to take possession of, hold, control and manage the property and assets of said Defendant corporation within the jurisdiction on your Honorable Court and for that purpose to appoint all necessary agents and attorneys, and employees that may be necessary to operate said plant, collect all outstanding accounts and bills receivable, and defend all suits in which the Defendant corporation may be interested, and to dispose of said property of said corporation within the jurisdiction of your Honorable Court subject to the orders of your Honorable Court.

2nd. That the said receiver may be authorized and directed under the order of your Honorable Court to continue the business of said Defendant corporation as a going concern until a further order of your Honorable Court, and borrow money on receiver's certificate for that purpose.

3rd. That out of the revenues coming into the hands of such receiver, after the payment of all just debts and expenses for operating the plant, the indebtedness due to your Complainants and others who may become parties to this suit may be paid.

4th. That your Complainants may have such other and further relief as they may be entitled to in the premises.

And your Complainants pray for the following process;

That a Subpoena may be issued in the usual form directed to The O.J. Keller Lime Company, a corporation duly incorporated under the laws of the State of West Virginia, commanding it to be and appear in your Honorable Court on some day certain to be named therein to answer the premises and abide by and perform such Decree as may be passed therein.

Stoner & Storm
Solicitors for Complainants.

State of Maryland, Frederick County, to-wit:-

I hereby certify that on this 22nd day of August, 1929, before me, the subscriber, a Notary Public for the State of Maryland, in and for Frederick County, personally appeared C. Albert Gilson, vice-president of the Farmers & Mechanics National Bank of Frederick, one of the Complainants in this cause, and made oath in due form of law that the matters and things stated in the above and foregoing Bill of Complaint are true to the best of his knowledge and belief.

N. Wilson Schley
Notary Public.

(Place of
N.P. Seal)

(Filed August 23, 1929)

EXHIBIT NO. 9

At the request of the O.J. Keller Lime Company the following Deed is Received for Record and Recorded July 24, 1899, at 4.40 O'clock P.M.

Test; Douglass H. Hargett, Clerk.