

BILL OF COMPLAINT FOR THE APPOINTMENT OF RECEIVER
OR RECEIVERS WITH AFFIDAVIT.

Frederick W. Obenderfer	:	No. 12627 Equity.
	:	
vs.	:	In the Circuit Court for
	:	
The Obenderfer-Dronenburg Company,	:	Frederick County, Maryland.
a body corporate of the State of	:	
Maryland.	:	In Equity.
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To the Honorable, the Judges of said Court:

The Bill of Complaint of Frederick W. Obenderfer, of Frederick City, Maryland, respectfully shows unto your Honorable Court:

1- That he is a resident of Frederick City, Frederick County, Maryland, and files this Bill in his own right as a stockholder of the defendant corporation and creditor thereof, and on behalf of such other stockholders and creditors of said corporation as may intervene herein.

2- That the Defendant, The Obenderfer-Dronenburg Company, is a corporation duly organized and existing under the Laws of the State of Maryland, having its principal office and place of business in Frederick City, Frederick County, Maryland, and is sued in its own rights.

3- That this corporation was organized on the 14th day of April, in the year 1923, for the purpose- "To purchase, lease or otherwise acquire property, real, personal and mixed, and to own, hold, sell and convey, exchange, encumber by mortgage, or deed of trust, or otherwise, deal in, utilize or dispose of such real, personal and mixed property and any rights, interests, equities, mortgages and options, in, upon or affecting any property, to buy, manufacture, sell, deal in and to engage in, conduct and carry on the business of manufacturing, buying, selling and dealing in goods, wares and merchandise, of every class and description, and more especially to buy, sell, deal in, conduct and carry on the business of buying, selling, dealing in household furniture, carpets, rugs, stoves, lamps, pictures, glass and wooden ware of every class and description," and generally to do all other acts connected with and essential to the successful prosecution of said enterprise, with a capital stock of One Hundred Thousand Dollars (\$100,00.00) divided into one thousand shares, of the par value of One Hundred Dollars (\$100.00) each; all of which will more fully appear by reference to a certified copy of the Certificate of Incorporation filed herewith and marked Exhibit "Certificate of Incorporation," which, together with all other Exhibits filed with this Bill, is prayed may be taken and considered as a part hereof.

4- That the total number of shares of the capital stock of said corporation issued are five hundred and fifty-seven (557), and there are none other outstanding.

5- That in pursuance of the purpose aforementioned, the said Company engaged in its business of manufacturing, buying and selling furniture and other wares authorized by its Certificate of Incorporation, at Nos. 24-26 East Patrick Street, in Frederick City, Maryland, where it is now still engaged, and at which place its principal office now is.

6- That said Company, finding its capital insufficient to conduct its business, obtained loans from time to time, to continue its business borrowed considerable money from the Complainant, and gave notes to banks upon which he is security and guarantor in the following sums of money, to-wit:

\$12,200.00-	Fredericktown Savings Institution
3,000.00-	Citizens National Bank
599.58-	Interest on said notes
600.00-	Cash, Frederick W. Obenderfer
<hr style="width: 100%;"/>	
Total --	\$16,399.58

none of which notes or money having been paid and upon which your Orator is responsible for the payment as endorser.

7- That the said Company is obligated to the payment of other debts than the above recited notes and its liabilities for debts due and owing in addition to the above are in