

and protection of the obligations set out in the declaration of trust, Exhibit "A", and in the event of the non-payment of said obligations during the lifetime of the said John D. Keller, then as more particularly set out in Exhibit "A" said property was to be sold by your Petitioner and the proceeds from said sale applied to the liquidation of said obligations hereinbefore more particularly enumerated.

10. That your Petitioner is advised that he is entitled to the advice and supervision of your Honorable Court in carrying out the terms of the trust hereinbefore mentioned, described and outlined, and in the disposition of said property and the distribution of the proceeds received therefrom.

WHEREFORE your Complainant prays:

(a) That your Honorable Court may assume jurisdiction of the trust hereinbefore mentioned, described and outlined, and that your Complainant may continue to administer said trust to a proper conclusion under the supervision and direction of your Honorable Court,

(b) That your Complainant may have such other and further relief as the nature and equity of his case may require,

MAY IT PLEASE YOUR HONORS to grant unto your Complainant the order of publication giving notice to the said Anita Keller Gill, and William T. Gill, Jr., her husband, J. Elwood Keller and Marjorie Keller, his wife, and Percy H. Keller, all of whom are residents of the City of Washington, District of Columbia, and E. Olin Keller, who is a resident of the City of New York, State of New York, all of whom are non-residents of this State, of the purpose and substance of this bill, warning them to appear in this Court in person or by solicitor, on or before a certain day to be named therein, to show cause, if any they have, why a decree ought not to be passed as prayed; and also the writ of sub poena directed to the said Mollie B. Keller, Lucille Recher and Philip Recher, her husband, all of whom reside in the City of Hagerstown, Washington County, Maryland, commanding them and each of them to be and appear either in person or by solicitor, in this Court, on or before a certain day to be named therein, to show cause if any they have, why a decree ought not to be passed as prayed.

And as in duty bound, etc.

Charles McC. Mathias

Leslie N. Coblentz

Emory L. Coblentz
Complainant.

STATE OF MARYLAND, FREDERICK COUNTY, to-wit:-

I hereby certify that on this 28th day of October, A. D. 1932, before me, the subscriber, a Notary Public of the State of Maryland, in and for Frederick County, personally appeared Emory L. Coblentz, and made oath in due form of law that the matters and facts stated in the foregoing petition are true as therein set forth, to the best of his knowledge, information and belief.

Given under my hand and Notarial Seal the date above written.

Place of
Notarial
Seal

Oscar L. Staley
Notary Public.

(Filed October 29, 1932)

EXHIBIT "A".

Frederick, Maryland
August 15, 1932.

I hereby acknowledge and declare that on or about December 18, 1917, John D. Keller, of Middletown, Frederick County, Maryland, delivered unto me a deed from the Middletown Improvement Association of Frederick County, Maryland, to me, Emory L. Coblentz, conveying a piece or parcel of land known as Lot No. 1, having a frontage of 54 feet, together with the northern one-half or 25 feet of Lot No. 2, making a total frontage of 79 feet, located on the East side of Prospect Street as mentioned and described from the plat of "Prospect