of the Land improvements and water power of the Okisko Company and hath filed a bill in this Honorable Court to enforce the same which is still pending and hath been answered by the said Company which alleges that the debt claimed has been satisfied by the transfer to the said Elysville Manufacturing Company of 250 shares of the stock of the said Okisko Company and your Orators aver that the whole of the lands, improvements and water power of the said Okisko Company seized and taken or directed to be seized and taken in execution by the Sheriffs of Baltimore County and Howard District as aforesaid is covered by the alleged vendors lien of the said Elysville Manufacturing Company and that if the sale advertised by the Sheriff of Howard District as aforesaid he proceeded with it will involve the most ruinous sacrifice of the said property of the said Okisko Company not only by reason of the claim upon its title occasioned by the pendency of the said suit for the said vendors lien but because of the severance of the said Company's works and factory from its water power and dam growing out of the incapacity of the said Sheriff of Howard District to seize and take said water power and dam in execution as out of his bailiwick and their actual or contemplated seizure as aforesaid on their process by the Sheriff of Baltimore County. Further complaining shew to your Honor your Orators that they know of no property and believe there is none belonging to the said Okisko Company except the Land improvements and water power so as aforesaid conveyed to it by the Elysville Manufacturing Company and its machinery and that in the present situation of its property if the same be disposed of under distress and execution as is threatened the said Company is insolvent even if the vendors lien claimed as aforesaid by the Elysville Manufacturing Company shall be disallowed, but that if said lien shall be held good your Orators believe and charge that the said Okisko Company is absolutely insolvent and unable to pay its debts. and your Orators further believe and charge that if the said property of the said Okisko Company which must be sold in any event is managed and disposed of in such manner as to give a clear title to it, and to protect it from delapidation and ruinous sacrifices it will most probably fetch a sum sufficient to pay all its creditors except the Elysville Manufacturing Company should its claim be adjudged a good one and that such management and disposition is now practically impossible without the intervention of this Court. Further complaining shew to your Honor your Orators that besides the 250 shares of the Capital stock of the said Okisko Company alleged by it to belong to the Elysville Manufacturing Company there were only 222 shares subscribed and taken by other persons and that 50 of said shares were taken and subscribed for by Samuel W. Gosnell (who is the President of said Okisko Company) and twenty five by Henry W. Hiser and Charles M. Dougherty by their partnership name of Hiser and Dougherty and twenty five shares by Thomas E. Hambleton and that each of the said persons is interested in some one or more of the executions herein before mentioned and your Orators believe and charge that the said Okisko Company which owing to the refusal of the Elysville Manufacturing Company to recognize its stock is practically under the control of the other stock holders being a minority of the whole number has through the influence of such other stockholders or some one or more of them deliberately and of purpose failed and neglected to

perform its incumbent duty of securing under the circumstances an equal division of its assets among all its creditors and permitted the institution of suits and acquirements of liens by such as choose to sue with a view to the obtention by said creditor stockholders of an inequitable preference in the payment of their debts and your Orators herewith file copies under seal of the Docket entries in the cases in which the said Samuel W. Gosnell and Hiser and Dougherty are interested marked Complainants Exhibit E from which it appears that they were the first to issue executions against said Company in advance of its other creditors and at the earliest practicable day and they charge that the company is now liable to several additional executions on other judgments and that its further possession or control of its property will be attended with certain loss bitself in case said executions shall issue as is most probable and with imminent danger of ultimate loss to such of its creditors as are unprotected by execution or other priorities.

Further complaining shew to your Honor your Orators that they are advised and believe that the five several writs of fieri facias aforesaid issued out of Baltimore County Court to Howard District are irregular and illegal and that no valid seizure or sale can be made under them because of the failure of the plaintiff therein to issue previous writs of fieri facias to the Sheriff of Baltimore County and to procure returns of nulla bona thereon but that the said Okisko Company or its President or Directors have taken no objection thereto and do not intend to move that said writs be quashed or to test their legality and will permit the same to avail for the Plaintiffs therein. Further complaining shew to your Honor your Orators that the persons who have recovered judgments against said Okisko Company before Justices of the peace as hereinbefore mentioned and taken portions of its machinery in execution thereupon upon writs of Fieri Facias directed to and in the hands of Thomas Watkins of Howard District Constable are Robert Porter and Townsend Townsend of the City of Baltimore partners by the name of Porter & Townsend John Gaw of Howard District, Jacob Timanus of said District, Samuel B. Smith of Baltimore County, Willis Chase of the City of Baltimore, Alexander F. Gaw of Howard District, Edward A. Talbot of said District, A. Fredericks who is so far as your Orators know or are informed not a resident of this State and Thomas E. Hambleton of the City of Baltimore as partners with other persons whose names are unknown to your Orators doing business in said City under the firm of Hambleton and Sons and that at their instance the said constable is proceeding with said executions and intends to advertise and sell the property seized under them in the course of a few days. Further complaining shew to your Honor your Orators that while they claim whatever legal priority they may be entitled to by reason of the delivery of their execution as aforesaid to the Sheriff of Baltimore County or otherwise and are content that all others shall enjoy their legal privileges if any yet that they have taken no steps for compelling a sale of the water power and dam of the Company or its land in Baltimore County and are willing to forbear taking any of this Honorable Court will proceed to administer and settle the affair of the said Okisko Company and its property according to its usual course in like cases. In Tender consideration whereof and for as much as your Orators are remediless in