

State of South Carolina,  
 County of Greenville,  
 Ex Parte,  
 B. C. Geer, H. P. McGee Franklin  
 Real Estate & Investment Company  
 and The First & Merchants National  
 Bank of Richmond, Virginia,  
 Petitioners  
 vs.  
 H. C. McGee, G. B. Martin and  
 B. C. Geer, co-trustees

Court of Common Pleas,

Petition

I.  
 your petitioners respectfully shew to the Court,  
 That heretofore, to-wit, on June 16, 1930 petitions in the  
 above entitled matter were filed in the Court of Common  
 Pleas for Pickens County and in the Court of Common  
 Pleas for Greenville County, that pursuant to the orders  
 signed by the Presiding Judge based upon said petitions,  
 Franklin Real Estate & Investment Company was appointed  
 trustee and took charge of the lands described in said  
 petitions under the terms of trust set forth therein,  
 that the petition which was filed in the Court of Common  
 Pleas for Greenville County and the order passed thereupon  
 are duly recorded in the R. M. C. Office for said County  
 in Deeds, Volume 153 at page 575, which petition fully  
 describes the trust property and the terms of trust upon  
 which Franklin Real Estate & Investment Company now  
 holds title to said property.

II.  
 That your petitioners deem it advisable that a  
 co-trustee be appointed by this Court to assist said  
 Franklin Real Estate & Investment Company as trustee  
 in the management of said trust property described in  
 the aforesaid petition recorded as above stated, and your  
 petitioners shew that J. C. Serrine of Greenville, South  
 Carolina, is a suitable person to act as such co-trustee,  
 that his appointment is agreeable to all your petitioners  
 and that he has agreed to act as such co-trustee upon  
 the terms of trust outlined in the petition recorded as  
 aforesaid.

Wherefore, your petitioners pray that the said J. C.  
 Serrine be appointed by this Court as co-trustee of the  
 property described in and upon the trusts as set forth  
 in the petition recorded in the R. M. C. Office for  
 Greenville County, S. C., in Deeds, Volume 153 at page 575.

B. C. Geer  
 H. P. McGee  
 Franklin Real Estate & Investment  
 Company,  
 By B. C. Geer, Pres. & Treas.  
 The First & Merchants National Bank  
 of Richmond, Virginia  
 By C. A. Burnett, Vice President

Sept. 4<sup>th</sup>, 1931

Petitioners

State of South Carolina  
 County of Greenville  
 Ex Parte  
 B. C. Geer, H. P. McGee Franklin  
 Real Estate & Investment Company  
 and The First & Merchants National  
 Bank of Richmond, Virginia

Court of Common Pleas