

"ANSWER"

STANLEY J. MEADOWS and : NO. 16135 EQUITY
KATHERINE MEADOWS, his wife,
MARY EVELYN BROWN and
WALTER A. BROWN, her husband :
VS. : IN THE CIRCUIT COURT FOR
BERNARD FORD MEADOWS and :
GRACE M. MEADOWS, his wife : FREDERICK COUNTY, IN EQUITY

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Answer of Bernard Ford Meadows and Grace M. Meadows, his wife, respectfully shows unto your Honors:

FIRST: Answering the first paragraph of the Bill of Complaint filed in this cause, your Respondents deny that John E. Meadows at the time of his death was seized and possessed of certain real estate located in Brunswick, Frederick County, Maryland, with improvements thereon fronting on the South side of Potomac Street for a distance of one hundred and fourteen (114) feet but aver that it was the intention of the Grantors in said Deed from H. Kieffer DeLauter, Trustee in No. 9093 Equity, Birdie Meadows, and your Respondents, Bernard Ford Meadows and Grace M. Meadows, his wife, to convey only the unimproved portion of the lot of land, except for a warehouse, as of the date of the execution of said Deed, to-wit; July 14, 1919 and recorded in Liber 328, folio 416, one of the Land Records of Frederick County; said unimproved portion of lot of land, being a part of the parcel of land conveyed to Christian Smith from Orrey O. Forsythe and wife dated June 25, 1910 and recorded in Liber H.W.B. 294, folio 122, one of the aforesaid Land Records and which parcel of land was to vest in your Respondent, Bernard Ford Meadows, upon the termination of a trust created in the Last Will and Testament of Christian Smith, deceased.

SECOND: Answering the second paragraph of said Bill of Complaint, your Respondents deny that the said John E. Meadows was so seized and possessed of said real estate and aver that he parted this life testate on or about March 8, 1933, and admit that the said John E. Meadows left his Last Will and Testament as therein mentioned.