

2. That he admits the allegations contained in the second, third, fourth and fifth paragraphs of the Bill of Complaint.

3. That your respondent admits the matters and facts set forth and contained in the sixth paragraph of said Bill. The respondent, Florence L. Essom, mentioned in said paragraph, is the sister of this respondent, Howard H. Loats, and ^{he} resides at Manchester, Maryland.

4. Answering the seventh paragraph of said Bill of Complaint, your respondent, because he is without any knowledge thereof, can neither admit nor deny the allegations contained therein with respect to the formation, conduct and the closing up of said asylum, but denies the right of the complainant to violate the specific terms of the Will of the testator, John Loats, deceased, by discontinuing the conduct of an asylum, sell the property or properties involved in these proceedings, and invest the proceeds thereof in the fund, use the income from said fund to pay the expenses of providing for female orphans in foster homes.

5. Answering the eighth paragraph of said Bill of Complaint, this respondent says that title to property described in the Bill of Complaint/vested immediately in Florence L. Essom, this respondent, and other parties who are the heirs of John Loats, the testator, and Louis Loats, by reason of the closing of the orphanage by the complainant in violation of the terms of the Will of John Loats.

6. Answering the ninth paragraph of said Bill of Complaint, this respondent denies the allegations stated therein and on the contrary alleges that because of the violation of the terms of the Will of John Loats, the testator, the properties vested in the heirs, devisees, personal representatives, descendants or successors of John Loats, the testator, and Louis Loats.

7. Answering the tenth paragraph of said Bill of Complaint, this respondent denies the allegations contained therein and says that the title of said property now vests in him and other heirs-at-law of said testator.