

In Chancery  
Sept 13

To The Honorable William Hilly Chancellor  
of Maryland

The Answer of John Drate of Anne Arundel County  
to the Bill of Complaint of Robert Franklin Administrator of Nicholas  
Norman, in this Court filed against him

This Defendant now, and at all times hereafter,  
reserves to himself the benefit of exceptions and so forth, for answer  
nevertheless to the said Bill or to so much thereof, as he is advised,  
it is material or necessary, for him to make answer unto, he

answering Admits that on or about the 21<sup>st</sup> July 1794, he became  
indebted to the said Nicholas Norman in the sum of one hundred  
pounds current money, and to secure the payment of that sum with  
interest he executed the Bill of sale mentioned and referred to by  
the Complainant, but for greater certainty as to the time, the sum  
intended to be secured, and the amount & kind of property conveyed,  
he prays the said Bill of sale may be produced and filed in this  
Court, and when so produced and filed, that it may be taken  
and considered as a part of this his answer

This Defendant further answering, states that the Bill of sale  
so executed as aforesaid, though purporting to be an absolute  
transfer of the property therein described, was intended to operate as  
a mortgage for the purpose aforesaid only, and not otherwise, and  
1789-1738