

Court John David Kunzer, Ann Elizabeth Kunzer and Joshua Newton Kunzer  
by Jonathan Barber their guardian

State of Maryland Frederick County to wit

On this 14th day of September 1852 the above named Jonathan Barber guardian, as aforesaid, appeared before me the Commissioner, and solemnly, sincerely and truly affirmed and declared, that the matters and things stated in the aforesaid answer are true to the best of his knowledge and belief

Affirmed before

James Kunzer Jr. Comr.

Answer

John Kunzer Int. Exec. of  
John Kunzer Sen. dec'd  
vs  
Elizabeth Kunzer  
John David Kunzer & others

No 2445 Equity  
In the Circuit Court for Frederick County sitting  
as a Court of Equity

The separate answer of Elizabeth Kunzer widow of Jasper Kunzer late of Frederick County deceased to the bill of Complaint against her in this case filed. This defendant in answer to the plaintiffs bill of Complaint in this case filed answers and says that she admits the several matters and things in the Complamant's said bill, to be true as therein stated, and that she is willing that your Honor should pass a decree for the sale of the real estate in said bill mentioned free of her dower, and instead of which said dower in the said real estate she is willing to take such part of the money arising from such sale as your honorable Court may think she is legally and equitably entitled to And as in duty bound &c

Filed Sept 18 1852

Elizabeth S Kunzer

Sol. order

John Kunzer Jr surviving Exec  
of John Kunzer Sen. dec'd  
vs  
Elizabeth Kunzer & others

No 2445 Equity in the Circuit Court for Frederick County  
as of Equity

The Clerk will issue a Commission to take testimony in this case to Frederick J Nelson Esq.

Filed Sept 20 1852

M<sup>rs</sup> C Sappington Solr for Compl't

Genl repl<sup>n</sup>

John Kunzer Jr surviving  
Exec of John Kunzer Sen. dec'd  
vs  
Elizabeth Kunzer, John David  
Kunzer and others

No 2445 Equity in the Circuit Court for Frederick  
County as a Court of Equity  
July Term 1852

The replication of John Kunzer Jr surviving executor of John Kunzer Sen. deceased, Complainant, to the answer of Elizabeth Kunzer and the answer of John David Kunzer, Ann Elizabeth Kunzer and Joshua Newton Kunzer infant defendants by their guardian Jonathan Barber This replant, in replication to said answers, says that he will aver and prove his said bill to be true, certain and sufficient in law to be answered unto, and that said answers of said defendants are uncertain, untrue and insufficient to be replied unto by this replant without that, that any other matter or thing in said answers contained, material or effectual in law to be replied unto, and herein not replied unto, confessed and avoided, traversed or denied so true, all of which matters and things this replant is and will be ready to aver and prove, as this honorable Court shall award and he humbly prays as in and by his said bill he has already prayed

Filed Nov 4 1852 as of Sep 20 1852

M<sup>rs</sup> C Sappington Solr for Compl't

Court

Maryland Oct



The State of Maryland to Frederick J Nelson Esq of Frederick County, Greeting, Be it known, that you are appointed Commissioner, to examine Evidence in a cause depending in the Circuit Court for Frederick