

Greeting, you are hereby commanded, that all concerns set apart, you personally appear before the Judge of the Circuit Court, for Frederick County setting as a Court of Chancery, to be held at the Court House, in Frederick Town, in and for said County, on the first munday of January next to answer the bill and Complaint of Daniel P Saylor & others, against you in our said Court exhibited, and set forth. Hereof fail you not, as you will answer the contrary at your peril. Witness the Honble Maester Nelson Judge of our said Court, the 8 day of November 1852.

Given 8 day of December 1852 Do the Sheriff of Frederick County
(Ross) Edw. Shriver cl -

"Errors?" Summoned Casper Manty.

Answers The separate answer of David Shoemaker, one of the Defendants, to the Bill of Complaint of Daniel P Saylor filed against this Defendant & others, in the Circuit Court, for Frederick County setting as a Court of Equity This Defendant, saving and reserving to himself, now & at all times hereafter, all & all manner of advantage of exception to the manifold errors & uncertainties in said bill of Complaint contained for answer thereto, answers & says that he knows nothing of the Inadmissibility of said John Shoemaker to said Complaint of his own knowledge, but believes the same to be correct, as therein stated This Defendant further answering, admits that said John Shoemaker made & executed his last will & Testament in due form of Law as stated in said bill of Complaint, and on the 13th day of February 1852. Departed this life, without having in any manner revoked the same, and that exhibit 13 is a true Copy of said last will and Testament, and that said John Shoemaker, in and by his said last will & Testament devised & bequeathed as alleged in said bill of Complaint, and do appoint Wilson L. Grimes the Executor thereof. That said Wilson L. Grimes accepted said Trust and settled up, the personal Estate of said Testator That said personal Estate is largely insufficient for the payment of the debts due and owing by said Testator This Defendant states further for answer, that the said John Shoemaker, for several years, before his death lived and cohabited with this Defendant, and that this Defendant, boarded supported & maintained said John Shoemaker, found his clothing washing &c for which the said John Shoemaker was at the time of his death largely indebted to this Defendant, as well fully appears by the account herewith filed marked Exhibit 13 to defendant's answer This Defendant, admits that said John Shoemaker died seized and possessed of the Real Estate therein specified & described, and admits all the other facts stated & set forth in said bill of Complaint He is willing a Decree shall pass as prayed for the sale of said Real Estate, But this Defendant claims to him his account allowed out of the proceeds of the sale of said Real Estate &c

Grayson Echellberger Sol for
David Shoemaker

State of Maryland Frederick County &c: On this 3rd day of January 1853 before the Subscriber a Justice of the Peace, in and for said County and State, personally appears the said David Shoemaker, & makes oath that the matters, and things stated and set forth, in the -