for answer to said Bill, answer and say that they admit to be true as therein charged That Lewis Rice & Elkanah Bateman entered into Partner Ship to Conduct the milling business in Frederick County That for that purpose they purchased with Partnership means, a mill with land attached, and a lot in the County & town of Frederick. That they Conducted the said Business, until the month of October 1852 when the partnership was dissolved by the death of said Lewis Rice. These respondents admit that during the existance of said Partnership the said Rice & Bateman, executed to these respondents the respective mortgages marked No 4 & No 5 & filed as Exhibits in these proceedings, for the purposes in said Deeds fully expressed These respondents, admit, That the said Partnership is heavily indebted & that it will require a sale of the Entire personal, and the greater part if not the whole of the Real Estate to pay their Debts. These respondents admit that the Property is now much encumbered by liens and the business intricate - That it would be far more advantageous to all parties interested - to wind up the Concern by a Sale under an order of the Court, to be made by some suitable person, by said Court to be selected, and these respondents feel satisfied, from the Condition the affairs of the Partnership are now in no other mode Could be selected by which a more satisfactory adjustment of affairs Could be made, than by such a Sale

M. Keefer -
Joshua Dill -

I agree to accept the above answer without Oath
Wm J. Ross Sol for Comp

The Joint and Several answer of Rosanna D Rice, Elkanah Bateman, and Sarah R Bateman his wife to the bill of Complaint of The President & Directors & Company of the Farmers Bank of Md filed in the Circuit Court for Frederick County sitting in Equity against themselves & others These respondents for answer to said bill answer and say - that they admit to be true as therein charged. - That Lewis Rice and Elkanah Bateman, entered into Partnership, to - Conduct the milling business in Frederick County - That they purchased a mill in the County, and a Lot in town for the purpose - and That said Partnership Continued until the fourteenth day - October - Eighteen Hundred and Fifty two when it was dissolved by the death of said Lewis Rice - The respondents Rosanna D Rice and Sarah R Bateman, having no knowledge of the matters & things charged in the Bill in reference to the monetary affairs of the Concern can neither admit, nor deny the same, and for answer to the same by the other respondent Elkanah Bateman, he refers to his - answer filed herein as surviving Partner

These respondents, admit - that Lewis Rice left a widow one of these respondents, and the following children Sarah R Bateman one of these respondents Charles J Martha M Benjamin H & Lewis - Rice. That said Children, all reside in Frederick County & are minor Infants under twenty one years of age except Sarah R Bateman

Elkanah Bateman
Rosanna D Rice -
Sarah R. Bateman.