

Court exhibited, and so forth. Hence fail, you not, as you well answer the Contingent at your peril. Witness the Hon Robert V Martin, Chief Judge of our said Court the 24th day of February 1851. Issued 24th day of September 1851
To the Sheriff of Frederick-County Wm D. Tyler ckr

Endorsed "Summoned" at B Standing Staff

Thereupon the following attachment was issued

~~John Hays~~ Frederick County to wit The State of Maryland, to the Sheriff of Frederick County Greeting you are hereby Commanded to attach. Maria Higgins, and Harriet E Hays and have them before the Judge of the Circuit Court, for Frederick-County sitting as a Court of Equity, to be held at the Court House in Frederick Town, in and for said County on the 1st Monday of July next to answer unto the State of Maryland as well touching a certain Contempt by them Committed, in not, appearing and answering unto the Bill of Complaint of Wm Anderson and the Harpers Savings Institution, against them in the said Court exhibited, as to such other matters, and things as shall be then and there alleged against them. Whereof you are not to fail, and fail not at your peril, and have you them and their true and correct Witness the Hon William Nelson Judge of said Court the 23rd day of February in the year of our Lord One thousand eight hundred and fifty two
Issued 14th day of June 1852 Edw Shriver ckr

"Endorsed" Attach^d Caspar Mantz Staff

The following answer was filed July 29. 1852

The separate answer of Maria Higgins to the Bill of Complaint of William Anderson and the Harpers Savings Institution, filed against her in Frederick County Court and now the Circuit Court for Frederick County, sitting as a Court of Equity This defendant - saving and reserving to herself, all and all manner of exception to every and all errors and insufficiencies of the Complainants said Bill of Complaint, for answer thereto nevertheless, or to so much thereof as she is advised it is material, or necessary, for her to make answer unto, answers and says that she has no personal knowledge of the transactions between the Complainants and the said Joseph E Hays, during his life time, by virtue of which the amount of the indebtedness of the said Hays as claimed by the Complainants to them was created nor does she know what amount of money if any was due to the Complainants by the said Hays, at the time of his death, or at the time of the filing of said Bill of Complaint This defendant - therefore leaves the Complainants to make out & sustain their said claim, in such manner, and by such proof as may be satisfactory to this Honorable Court - This defendant further answering says - That although she has no personal knowledge of said claim, or its justice, or validity in law or equity she has often heard the said Hays say - That in Justice and Equity he did not owe the same to the Complainants, at the same time stating the facts, and circumstances going to show - That he ought not to pay the same, or any part thereof
This defendant further answering admits - That the said Hays at the time stated in said Bill of Complaint, executed & delivered to her the deed of Bargain and sale - of which Complainants Exhibit marked, A is true Copy, But she denies that, That the said deed was made to delay, hinder, and defraud the said Complainants of their said claim, or for any such fraudulent purpose as set forth in said bill of Complaint On the contrary - This defendant says - That the said Hays at the time said deed was made, has five children, and still has four children one having died Ellen Hays the one a son named William Henry, and three daughters named - Susan Hays Maria Hays and Mary A. Hays That he states to this defendant