

should she die - without conveying to them, the said land as intended by their said father. But should she convey said land to them in compliance with said trust and understanding between this defendant, and their said father, then the said notes would be null & void, and returned to her, the said children never having given her any valuable consideration for the same. These notes are now in the possession of the said children, and this defendant will insist, that if the said deed to her should be regarded by this Court at the final hearing of this cause as null and void and the land therein specified decided to be sold, for the benefit of the Complainants. That then this Court will order & decree - That said notes shall be delivered up to this defendant for the purpose of being cancelled. And this defendant is advised - That under the foregoing state of facts, as set forth in this her answer, it is necessary - That the said heirs at law of the said Joseph G. Hays should be made parties defendants to said Bill of Complaint, so that the rights of all the parties in interest in the subject matter in controversy in this case should be fully - before this Court for its adjudication & Decree. And this defendant further answering denies all fraud with which she is charged in and by said Bill of Complaint and does not admit, that the said Joseph G. Hays had any fraudulent design or purpose in the execution of said deed or that he intended thereby to hinder & delay the Complainants, in the recovery of any just claim they might have against him, and she prays to be hence dismissed with her reasonable costs in this cause - sustained)

Richd A. Schley, Solicitor
for Deft

State of Maryland Carroll County to wit. On this 25th day of June in the year 1852 before the Subscriber a Justice of the peace, in and for the State & County aforesaid personally appeared - the above named Maria McQuinn, and makes oath in due form of Law that the matters stated in the foregoing answer are true to the best of her knowledge information & belief - Sworn Before

Jonathan Dorsey

The following answer was filed same day to wit
The answer of Harriet Hays one of the defendants to the Bill of Complaint of William Anderson and the Maryland Female Seminary's Institution filed against her in Frederick County Court and now the Circuit Court for Frederick County sitting as a Court of Equity - This defendant for answer to said Bill of Complaint or to so much thereof as she is advised it is material or necessary for her to make answer unto answers & says that she admits - that she is the widow of Joseph G. Hays the person named in said Bill that he died intestate and that letters of administration on his personal Estate were by the Judges of the Orphans Court of Frederick County, granted to her she also admits - That the personal Estate of said Intestate is not sufficient to pay all his debts as will appear by her last account settled with the said Orphans Court a copy of which marked A-1 is herewith exhibited and which she prays may together with all other exhibits, hereafter to be made by her, be taken & considered as a part of this her answer. This defendant further answering says that she has no personal knowledge of the execution of the pretended debt, or claim of the Complainant. But she has often heard her said husband say in relation to the same that in Justice and Equity he did not owe the Complainant any part thereof. That the said claim arose whilst he was acting as the Treasurer of said Saving Institution and was for some irregularities, and errors which appeared on the Books of said Institution, in the issuing of certificates of deposits made in said Books. That being a Physician he was frequently absent from said Institution, attending