

Contrary to the understanding of the said John Ebert, in his life time, and this defendant, and this defendant denies that she is indebted, or in any way accountable to the Complainants, for rent of said property, and even if she is, the Complainants as this defendant is advised has a complete, and adequate, remedy, in a Court of Common law, without the aid of this Court, as this is a matter entirely between this defendant & the Complainants, of which the other Defendants in this case, as the heirs at law of the said Augustus F. Ebert has no concern. This defendant states further for answer that she positively denies that the Complainants, in this case have any sort of just claim for expenditures for repairs & improvements of the said House & premises, against this defendant, or the heirs at law of said Augustus F. Ebert as most unjustly charged in said bill of Complaint and this defendant, positively denies that not one cent of the claim & charges contained in the paper exhibited in this case, marked Exhibit C, is just & owing to the Complainants, and that the whole of the said pretended account is a false, & unjust account. This defendant states further for answer, and alleges, that the previous debts, claims and charges for rents, repairs, & improvements of said house, and premises as aforesaid, and all other claims, and charges set forth in said Bill did not, nor did any part thereof accrue, at any time within three years next before the filing of this bill of Complaint, and this defendant insists on the Statute of this State for the limitation of actions as a full complete, and proper bar to this suit, so far as the said pretended claims are set forth in said bill of Complaint, and she claims the benefit of said Statute of limitations as fully & effectually as if the same had been in due form specially pleaded. This defendant states further for answer that she as the widow of the said deceased protests against the sale of the said Real Estate, by a Decree of this Honble. Court, so far as her claim & interest in the said House & premises are concerned, and this defendant denies that it would be for the Interest & advantage of all the said heirs at law of the said Augustus F. Ebert, two of them being Infants of tender years, to have the said House, lot, and premises sold as prayed, and this defendant denies all & all manner of debt, or claim for rent, repairs, expenditures, and improvements of said House & Lot &c. in the Complainants said Bill - most unjustly charged against this defendant, and the heirs at Law of said Augustus F. Ebert, without that that any other matter, or thing in the Complainants said bill of Complaint, contained, material, or effectual for this defendant, to make answer unto, and not herein & hereby sufficiently answered unto, confessed, or avoided, traversed, or denied is true to the knowledge and belief of this defendant, all which matters & things, this defendant is ready to aver, maintain & prove as this Honorable Court shall award, and he humbly prays to be hence dismissed, with her reasonable costs & charges in this behalf most wrongfully sustained. &c.

Jo: M. Palmer, Solr.

For this defendant

The Separate answer of Octavio A. Ebert, one of the Defendants to the Bill of Complaint of Valerius Ebert, and John M. Ebert Complainants, in the Circuit Court, for Frederick County sitting as a Court of Equity.

This said Defendant saving to himself, all & all manner of exceptions to the many untruths, errors, uncertainties & other imperfections, in