

their guardian, to the Bill of Complaint of Basil Norris, against them in the Circuit Court for Frederick County, sitting as a Court of Equity - exhibited. These defendants cannot admit any of the matters and things alleged in the said Bill - and being infants of tender years submit their rights to the protection of this court.

Charles Cook, Guardian

On the 8th day of July A.D. 1856, the above named Charles Cook appeared before me Commissioner, and made oath that the matters and things stated, in the foregoing Answer, are true to the best of his knowledge & belief

William G. Cook

Commissioner.

The joint answer of Benjamin Deford and Albert S. Webb, to the Bill of Complaint of Basil Norris, in the Circuit Court for Frederick County, as a Court of Equity

These defendants now and at all times hereafter saving & reserving to themselves all, and all manner of benefit and advantage of exception to the manifold errors, uncertainties, imperfections and insufficiencies in the said Bill of Complaint contained, for answer thereto or unto so much & such parts thereof, as they these defendants are advised is material for them to answer unto. They these defendants answering say, they of their own knowledge know nothing of the will of George Williard of the legacies charged upon the lands devised in the said will, as alleged in the Complainant's Bill of Complaint. They these defendants neither deny or admit the said will or the legacies as charges upon the said land. These defendants admit that John Williard, deceased, was on the 11th day of May 1850 indebted to them in the sum of Three thousand three hundred and forty three dollars, and that the said John Williard did on that date execute & deliver to them a Mortgage upon his real & personal estate to secure the payment of the said sum of money with interest from the date of the said mortgage - These defendants admit the Exhibit No. 6. in the Complainant's Bill of Complaint is a copy of that mortgage - These defendants admit that they did execute the release exhibited No. 7 in the said Complainant's Bill of Complaint postponing their lien upon the real estate in favour of the Frederick town Savings Institution as set forth in the said release - But these defendants claim the benefit of their said mortgage to secure their claim against all other creditors - and their full & entire benefit of their said mortgage after the Frederick town Savings Institution has received the full benefit of the said release, executed & delivered as aforesaid, by these defendants. - These defendants further answering, aver that the said sum of Three thousand three hundred and forty three dollars, with interest from the 11th day of May 1850, is still due & unpaid to these defendants. These defendants admit that the said John Williard is dead & these defendants are informed that he died intestate, and that letters of administration upon his personal estate have been granted to his widow Mrs Louisa Williard. - These defendants are informed & believe that the personal estate is not sufficient to pay the just debts of the said John Williard, and that the real estate must be sold for that purpose. - These defendants are willing that the said real estate shall be decreed to be sold, for the purpose mentioned in the Complainant's said Bill of Complaint - But these defendants claim the full benefit of their said mortgage in the distribution of the proceeds of the sale, after the Frederick town Savings Institution has received the full benefit of the release executed by these defendants & which exhibited in the Complainant's said Bill of Complaint.

Filed July 25 1856

Richard H. Marshall, Solicitor for Benjamin Deford & Albert S. Webb.

The Answer of the Frederick town Savings Institution, to the Bill of Complaint filed in the Circuit Court, as a Court of Equity, by Basil Norris against themselves & others.

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