

in the Circuit Court for Frederick County as a Court of Equity.

This defendant for answer to said Bill - answers and says that he admits that Samuel Geyer died in the year eighteen hundred and fifty six, seized of the real estate described in the Exhibit in said Bill, having first made his will and devised his real & personal estate to his widow for life - and after her death or marriage to his children John W. Geyer, J. Milton Geyer Eliza Ann Hammond widow of Nicholas M. Hammond and Cornelia L. Gelles wife of Joseph Gelles of the State of Md. - This defendant further admits that John W. Geyer and J. Milton Geyer were appointed by said testator Executors of his last will and entered upon the duties of their said office. - This defendant is willing to admit that Samuel Geyer was in his life time indebted to John W. Geyer in the sum of one thousand and ten dollars as stated in said Bill, and that the personal estate of said Samuel Geyer was and is insufficient to pay his debts. - This defendant further admits that Matilda Geyer - John W. Geyer, J. Milton Geyer and Eliza Ann Hammond borrowed the sum of six hundred & fifty dollars from this defendant and to secure the payment of the same executed the mortgage the copy of which is Exhibited in said Bill marked Exhibit C. - The defendant further states that the said sum of six hundred and fifty dollars with interest from the 25th day of April in the year Eighteen hundred and fifty three is still due and unpaid. - This defendant further admits that the said John W. Geyer died in the year Eighteen hundred and sixty one, and that William P. Mansley has been appointed by the Orphans Court for Frederick County administrator upon his personal estate and has entered upon the duties of his office. - This defendant further admits that James Milton Geyer the other Executor of the will of Samuel Geyer is also dead, and that all the personal assets of said Samuel Geyer have been administered. - This defendant submits that such decree may be passed in the premises as to this Court may seem right, praying to be recommended

(Jesse Wright)

Answer of E. A. Hammond & Co.

The joint and several answer of Eliza Ann Hammond of Frederick County State of Maryland, of Joseph Gelles and Cornelia Gelles of the State of Ohio, to the Bill of Complaint of William P. Mansley administrator of the goods, Chattels &c. of John W. Geyer late of Frederick County State of Maryland dec^d filed in the Circuit Court for Frederick County as a Court of Equity.

These defendants for answer to said Bill of complaint, answer and say that they admit that Samuel Geyer was indebted in his lifetime to John W. Geyer in the sum of one thousand and ten dollars, for taxes and debts paid by the said John W. Geyer for the said Samuel Geyer and at his request, at that Exhibit I is a correct statement of such debts, and that the said debt is still due and unpaid. - These defendants further admit that the said Samuel Geyer died in the year Eighteen hundred and fifty six as stated in said Bill seized and possessed in fee of the lands described in Exhibit C in said Bill. - These defendants further admit that said Samuel Geyer prior to his death made & executed his last will & testament, & devised his estate real & personal to his wife during her life or widowhood - and after her death or marriage to his children John W. Geyer, J. Milton Geyer, Eliza Ann Hammond now widow of Nicholas M. Hammond, and Cornelia L. Gelles now wife of Joseph Gelles residing in the State of Ohio, and that the said Samuel Geyer appointed his sons John W. Geyer & J. Milton Geyer Executors of his last will, and further admit Exhibit D, to be a true copy of said will. -

These defendants further admit that the said J. Wesley Geyer & J. Milton Geyer entered upon the duties of their office as Executors & applied the personal assets to the payment of debts and over paid out of their own funds the assets in their hands as Executors & that the Estate of said Samuel Geyer is still indebted to them for such overpayment. - These defendants further admit that the widow of said Samuel Geyer is dead, that the said Matilda Geyer widow John W. Geyer, Eliza A. Hammond & James Milton Geyer on the fifth day of April Eighteen hundred & fifty six, borrowed from Jesse Wright the sum of six hundred & fifty dollars, and to secure the payment thereof executed a mortgage of the lands devised to them by the will of said Samuel Geyer, and that Exhibit E, is a true copy of said mortgage, these defendants

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