

stated of the substance and object of this bill and praying
them to appear in the Court in person or by solicitor or on
before a certain day to answer the premises and their cause
if any they have why a decree shall not pass as prayed

Charles Schlegel

By Nelson C.

Solicitor for complainants

State of Maryland Frederick County Jct.
I hereby certify that the above is a true copy of the original
Bill in N^o 2221 Equity now on file in my office

Seal
C

In testimony whereof I hereunto subscribe
my name and affix the seal of the Circuit Court
this 21st day of January A. D. 1858

B. G. Fitzhugh Clerk

The separate answer of William G. Grimes to the Bill of Complaint
of Anton James Susan Roup & David Roup against him
& others exhibited in Frederick County Court as a Court of Equity

This defendant saving and reserving to himself all and
all manner of exceptions to the errors uncertainties & imperfections
in the said bill of Complaint contain for answer thereto or
parts so much thereof as he is advised it is material
or necessary for him to make answer unto answer and
day he prays that the parties named in said bill
and the him and representatives of William Grimes and
that said William Grimes is dead and died seized and
possessed of the Real estate in said bill mentioned and
that exhibits A & B are his title papers for said real estate
The Defendant is not prepared to admit or deny that said
land is susceptible of division amongst those entitled
to it but the defendant denies that a sale of said land
at this time would be to the benefit and advantage of the
parties entitled & interested but on the contrary it would
be greatly to the loss of all concerned because the whole
real estate consists of only twenty five acres of land or there
abouts in all of which Mary Grimes the widow of the said
deceased William Grimes has a right of dower which she
refuses to sell and if the said real estate be put into
market encumbered with her dower right it will not
Command any thing like the value of said land but the
same must & will be greatly sacrificed to the great injury
of those entitled to the said estate The Defendant therefore
is opposed to the decree for a sale of said real estate and prays
that the same may not be granted and he prays hence to
be dismissed with his reasonable costs & charges

W. Nelson Solicitor
for Defendant

State of Maryland Frederick County Jct.
On this 2^d day of July in the year 1849 before the subscriber