

To the Sheriff of Frederick County
Mr. Sherry B. G. Fitzhugh Clerk

Maryland Act.

The State of Maryland To Howard D. O'Neil supposed to live in Carey Street - Franklin Square Baltimore City. Goering. You are hereby commanded that all excuses set aside you personally appear before the Judge of the Circuit Court for Frederick County, sitting as a Court of Equity, to be held at the Court House in Frederick town in and for said County on the first Monday of July next to answer the bill of complaint of Thomas Flanagan against you in our said Court exhibited, and so forth. Hereof fail you not, as you will answer the contrary at your peril. Witness the Honorable Madison Nelson Judge of our said Court, the 10th day of February 1860. Issued the 1st day of March 1860.

To the Sheriff of Baltimore City.
Mr. Sherry B. G. Fitzhugh Clerk

Answer of defendants

Thomas Flanagan } N^o. Equity
vs } In the Circuit Court for Frederick County
Mary Oates & John Oates } in Equity
and others

The joint and several answer of Margaret Flanagan and John Flanagan two of the defendants in this case to the bill of complaint of the said Thomas Flanagan against them and others exhibited.

These defendants admit the several matters and things stated in the said bill of complaint to be true so far as they know or are informed and believe and consent to the passing of a decree by this Court for the appointment of a new trustee and for the sale of the real property mentioned in the said bill and exhibits and these defendants respectfully recommend to your Honor the appointment of James P. Sherry of Frederick City as such trustee and respondents pray to be allowed their just lawful shares of the proceeds of the sale of the said real estate the said deed of trust according to the judgement of your Honor and to be allowed their reasonable costs and your respondent John Flanagan further states to your Honor that during the year eighteen hundred and sixty with the consent of his mother the said Rosanna Flanagan he did erect at his own costs and expenses on a portion of said real estate a carpenters Shop which he has heretofore used and he prays to be allowed for said improvement having cost him about one hundred Dollars or that he be permitted to remove the said building or shop and they will ever pray &c

Witness
Michael Farrell John Flanagan
Margaret Flanagan

Answer of complainant & defendants

Thomas Flanagan } In 2015 Equity
vs } In the Circuit Court for Frederick County
Mary Oates, John Oates & others } as a Court of Equity