

of Nancy Taylor, against you in our said Court Exhibited, and as forth. ~
Hereof, fail you not, as you will answer the contrary at your peril. ~ Witness the
Honorable Madison Nelson, Chief Judge of our said Court the 11th day of May 1866. ~
Served the 8th day of August 1868. ~ To the Sheriff of Frederick County ~
Filed Aug. 22nd 1868 ~ Charles Mealy, Clerk

Endorsed "Summoned"

Charles Mealy, Clerk

N O Neighbours Sheriff

Answer of J. G. M.

The separate answer of Joseph G Miller, one of the Defendants to the Bill of Complaint
of Geoffrey Mealy filed in the Circuit Court for Frederick County sitting as a Court
of Equity. ~

This Defendant for answer to said Bill of Complaint, says, he admits that
William Staley is indebted to said Complainant as therein alleged, and that the paper
filed as Exhibit Aⁿ 3, is a true Copy of said Judgment, and this Defendant states
further that on the 25th day of October 1864 one Franklin Myers by Ezra Houch his Guardian
obtained in the Circuit Court for Frederick County a Judgment, against said William
Staley, for the sum of six hundred and fifty dollars with interest thereon, from
the 7th day of October 1859, and for six dollars and seventy eight cents additional Costs,
and that the interest on said Judgment was paid to the 7th day of April 1862, as
will fully appear by said Judgment, a true short copy whereof is herewith as Exhibit
J. G. M. to this answer ~ That on said 25th day of October 1864 one Frederick W. Brown
merman obtained in said Circuit Court a Judgment against said William St.
Staley for the sum of One hundred and Nine Dollars and fifty cents with interest from
the 20th day of July 1860, and for six dollars and thirty two cents costs, and seventy eight
cents additional Costs ~ That said Judgment was entered to the use of William G.
Ross Esq, and by him entered to the use of this Defendant, as will appear by said Judgment
a true short copy whereof is filed herewith as Exhibit J. G. M. to this answer ~ That
the Judgment marked Exhibit J. G. M. was entered to the use of this Defendant, and
that the whole of sums of Money therein specified, Except what is credited on J. G. M. is
still due and owing thereon to this defendant. ~ This Defendant is willing a decree
shall pass for the sale of said Mortgage premises for the payment of the liens
thereon according to their legal and equitable priorities. ~ This Defendant
knows nothing of the other allegations in said Bill, and neither admits nor
denies them, but leaves the Complainant to his proof thereof. ~

Filed Aug. 24th 1868 ~

Grayson Eichelberger
Attorney for Defendant

Exhibit J. G. M.
To Answer

Franklin Myers - by
Ezra Houch, Guardian
use of Joseph G Miller
vs
William St. Staley

N^o 194 Trials to October Term 1864

1864 October 25th Judgment for \$ 650. with
Interest from 7th October 1859 until paid, & Costs \$ 6.70
additional Costs, 48¢ ~

Release Interest paid to 7th April 1862 ~

Fieri Facias N^o 80 Juds to J. C. 1865

Just Jos. W. Learty, Clerk

3^d October 1866

Which is true, Endorsed, to wit

Judgment ~ \$ 650. 00
Sub. from April 9th 1862.
To Jan 30th 1869 265.75
Costs of sub 27.48
\$ 356.77

Filed Aug. 24th 1868 ~

Answer of J. G. M.

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Hudson &
Hudson &