

Answer of
H. C. Koehler
Guardian

The Answer of Herman C. Koehler Guardian ad litem of Elizabeth Worthington a lunatic, appointed by the Court to answer the Bill of Complaint of Joshua Worthington and wife and others filed in the Circuit Court for Frederick County as a Court of Equity against the said Elizabeth Worthington and others.

This respondent appointed Guardian ad litem of Elizabeth Worthington a lunatic, by order of the Court dated on the twenty eighth day of February in the year Eighteen Hundred and Seventy, and passed on a petition filed in said cause by Joshua Worthington and wife and others, answers and says, that the Defendant Elizabeth Worthington being a lunatic, cannot admit any of the matters and things stated in said Bill, and submits her rights to the protection of the Court.

H. C. Koehler

On this 12th day of March 1870, the above named Herman C. Koehler appeared before me, and made oath that the matters and things stated in the foregoing answer are true to the best of his knowledge and belief.

Filed March 12th 1870

Charles Mantz, Clerk
of the Circuit Court for Frederick County

Petition of
Joshua Worthington
& wife for dower
of dower

To the Honorable the Judges of the Circuit Court for Frederick County in Equity.

The Petition of Joshua Worthington and Henrietta Worthington his wife, respectfully shows to your Honors that your Petitioners together with Nicholas W. Dorsey and Lloyd Anna Dorsey his wife and Levinia Worthington filed their Bill of Complaint in your Honorable Court praying a Sale of the Real Estate of Upton Worthington late of Frederick County deceased, and that the proceeds of said sale might be distributed amongst your Petitioners and the other heirs at law of the said Upton Worthington.

Your Petitioners further show that Catharine Worthington the widow of said Upton Worthington, who has a dower interest in the land of which the said Upton Worthington died seized and possessed, and who was made a party defendant in said Bill of Complaint, has filed her answer to said Bill of Complaint, and claims that dower in the said lands be assigned to her.

Your Petitioners therefore pray your Honors to pass an order, directing that a Commission be issued by the Clerk of your Honorable Court to five discreet persons of Frederick County, commanding them or any of them, to go upon, walk over, survey, lay off, and designate, one third part, or so much as may be equivalent to one third part in the said lands, whereof the said Upton Worthington died seized and possessed, as and for her dower in said lands. And your Petitioners will ever pray &c.

Wm. Ross
Chas. W. Ross
Sols for Petitioners

In the Matter of the Petition of
Joshua Worthington and Henrietta
Worthington his wife

No. 3537 Equity
In the Circuit Court for Frederick
County in Equity