

straw did he so receive, and what was the value thereof?

And these Defendants further pray that the said Complainant may be compelled to answer, severally and specifically, each and all the aforesaid interrogatories, upon his corporal oath, on or before some certain day to be named by your Honorable Court, and that these Defendants may be hence dismissed with their reasonable costs.

Milton G. Orner
Sols for Defendants

Filed Nov. 17th 1870 ~

Dep's Exhibit "A"

This Deed made this 14th day of February in the year Eighteen Hundred and Sixty Six by Thomas Hammond of Frederick County and state of Maryland Witnesseth that in Consideration of the sum of Seven thousand three hundred and four dollars the said Thomas Hammond doth grant in fee simple to Jacob J. Houck of Frederick County and State aforesaid all that part of a tract of land lying in Frederick County called "Hammonds Chance" contained within the following meets and bounds viz. Beginning at the end of the fourth line of the Original tract and running thence North ten degrees East forty perches to a stone North thirty degrees East sixty perches to a stone North forty degrees West sixty perches to a stone South seventy one degrees West one hundred and twenty perches to a stone South thirty nine and three quarter degrees West twenty six perches, thence South twenty one degrees East, twenty six and three quarter perches to a stone, thence by a straight line to the beginning, containing Eighty three acres of land more or less ~

Witness our hand and seal

Dennis C. Tyler

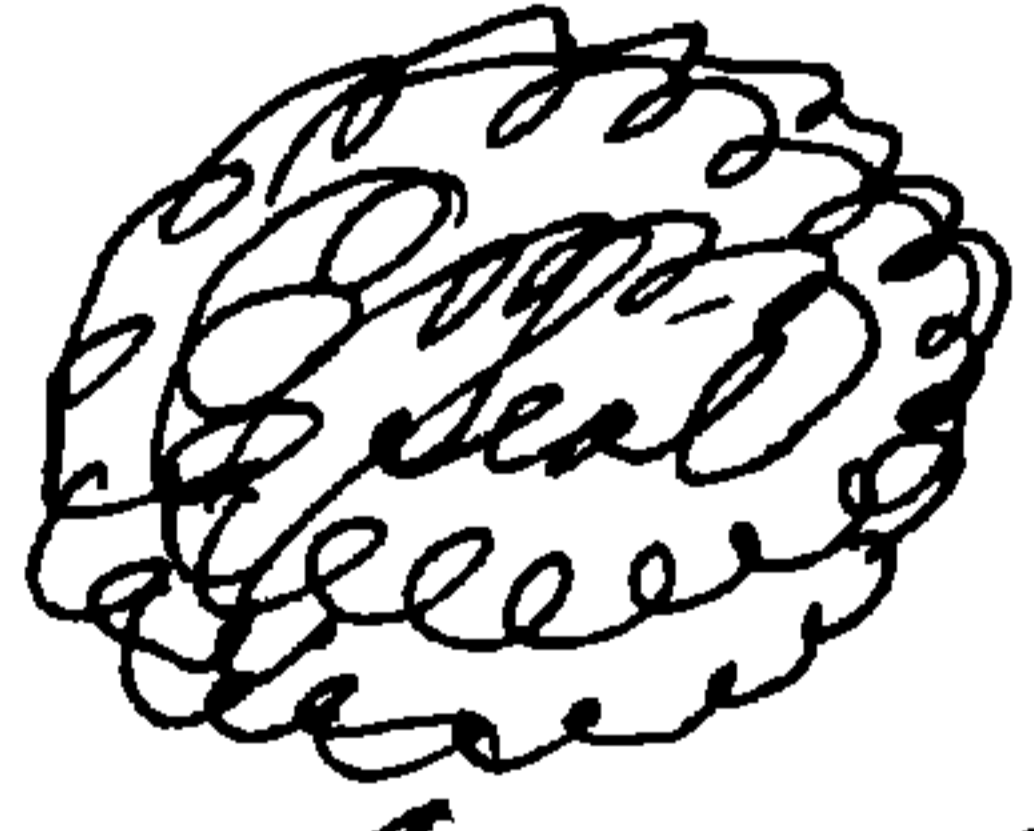
Thomas Hammond

State of Maryland, Frederick County, Sch:

I hereby certify that on this 14th day of February Eighteen Hundred and Sixty Six, before the subscriber a Justice of the Peace of the State of Maryland in and for Frederick County, personally appeared Thomas Hammond and acknowledged the foregoing deed to be his act.

Dennis C. Tyler J. P.

I hereby certify that the foregoing is a true Copy of the Original Deed as recorded in Liber J. W. L. No. 4 folio 106 &c. One of the Clerks of Frederick County ~



In testimony whereof I hereunto subscribe my name and affix the seal of the Circuit Court for Frederick County, this 16th day of November A. D. 1870

Charles Meantz, Clerk

Filed Nov 17th 1870 ~

Answer of Thomas Hammond

The Answer of Thomas Hammond to the interrogatories propounded to him by Jacob J. Houck and Ann Elizabeth Houck his wife in their Answer filed in No. 3044 Equity, Circuit Court for Frederick County as a Court of Equity. ~

This Respondent for answer saith ~

1st Interrogatory - That the Mortgage given by Jacob J. Houck and Ann E. Houck his wife, and exhibited in this Bill filed in this case as Exhibit No. 1 was given to secure the purchase money of part of a tract of land, situate in Frederick County, State of Maryland, called "Hammonds Chance" and is part of the same property described in Defendants Answer as Exhibit 1. And further states, that the sum of Seven thousand dollars, was the purchase money for said land