

et al., against you in said Court exhibited and so forth.  
 Hereof, if and you not, as you well answer the contrary at your peril ~ Witness the  
 Honorable William P. Maulsby, Chief Judge of our said Court, the 8<sup>th</sup> day of May  
 1841 ~ Received the 6<sup>th</sup> day of September 1841 ~  
 To the Sheriff of Frederick County ~ Charles Mauley, Clerk

Endorsed  
 Received September 6<sup>th</sup> 1841 and forthwith delivered to the Sheriff of Washington  
 County ~ J. M. McKeffler, Clerk

And further Endorsed viz- "Summoned"  
 Filed September 18<sup>th</sup> 1841 ~ Daniel White Sheriff  
 of Washington County -

The answer of John T. Worthington and Mary R. D. Worthington his wife of Frederick  
 County, State of Maryland, to the Bill of Complaint of Charles S. Simmons and  
 others filed in the Circuit Court for Frederick County as a Court of Equity.  
 These Defendants for answer to the said Bill of Complaint answer and say,  
 that they admit the facts as stated in said Bill, to be true as therein stated,  
 and agree that such decree may be passed in the premises, as to this Court may  
 deem just and Equitable.  
 Filed Sept. 23<sup>rd</sup> 1841 ~ John T. Worthington  
 Mary R. D. Worthington

Charles S. Simmons and  
 Elizabeth Simmons his  
 wife and others ~  
 Or  
 Clara Ann Simmons & others } No 3705 Equity -  
 In the Circuit Court for Involvents ~

To the Clerk of the Circuit Court for Fred<sup>rick</sup> County -  
 The Subpoenas in this case issued, having been duly returned sum-  
 moned, as to Clara Ann Simmons, Richard H. Simmons and Mary Simmons  
 infant defendants. ~ You are authorized to issue a Commission to Charles  
 H. Daughler empowering him to assign and appoint Herman K. Koehler as  
 guardian for said infants, and to take the answers of said infants by their  
 said Guardian. ~  
 Filed October 7<sup>th</sup> 1841 ~ J. Ross  
 Clerk for Complainant

Commissioner Maryland, Sec.  
 The State of Maryland, To Charles H. Daughler Esq of  
 Frederick County, Greeting. ~  
 Whereas, Charles S. Simmons and Elizabeth Simmons his wife and others  
 have intest exhibited their Bill of Complaint before me in the Circuit  
 Court for Frederick County, sitting as a Court of Equity, against Clara  
 Ann Simmons, John T. Simmons, Richard H. Simmons and Mary Simmons.  
 And Whereas I have, by my writ, lately Commaned the said Defendants  
 to appear before me in said Court as a Court of Equity, at a certain  
 day now past, to answer the said Bill of Complaint, but for as much as  
 the said Clara Ann Simmons, John T. Simmons, Richard H. Simmons and  
 Mary Simmons, are infants under age, and cannot answer the said  
 Bill of Complaint, nor defend the suit nor that having a guardian and re

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Ans. 100 of 9.11  
 J. Worthington