

Court for Frederick County as a Court of Equity and by the Authority then of that leave, he and the same is hereby granted P. Fullerton Williard and Mary of Williard his Wife to file this answer in this cause forthwith.

Filed June 13, 1873.

John A. Lyne
Judge of the Circuit Court

Answer of
P. Fullerton
& Wife

The Joint and several answer of P. Fullerton Williard and Mary of Williard his Wife two of the Defendants to the Bill of Complaint of Josephus F. Harley and Henry F. Harley filed in the Circuit Court for Frederick County as a Court of Equity against them and others. These Defendants admit that Otto F. Harley died intestate at or about the time stated in said Bill, and was at the time of his death seized of the Real Estate described in said Bill and the Exhibits thereto. These Defendants admit that said Otto F. Harley left surviving him a widow Catharine Harley and the following children, namely; a Son John F. Harley residing in the State of Pennsylvania, a Son, George W. F. Harley residing in Frederick County a Son, Henry F. Harley residing in Frederick County, a Son, Josephus F. Harley residing in Frederick County a Daughter, Mary F. now wife of P. F. Williard who are these Defendants and reside in Frederick County, and a Son Cornelius F. Harley a son resident of the State of Maryland, all of whom are Adults and are married or single respectively as is stated in said Bill. These Defendants admit that Letters of Administration were granted to Catharine Harley as is stated in said Bill. These Defendants jointly and severally deny that said Otto F. Harley was indebted to the Complainants either individually or jointly as is alleged in said Bill and the Exhibits thereto. These Defendants further answering say that said Otto F. Harley never promised as is alleged in said Bill Exhibits or any or either of them, These Defendants further answering say that said Otto F. Harley in his life time satisfied and discharged the Complainants claims and each of them by payment. These Defendants further answering say that the alleged claims individual and joint did not nor did either of them accrue within three years before the filing of said Bill. These Defendants further answering say that the Complainants were jointly and severally indebted to said Otto F. Harley at the time of his death in an amount equal to their respective claims joint and several respectively for the use and occupation of the Lands of said Otto F. Harley and for goods bargained and sold them and each of them by said Otto F. Harley in his life time and for the money lent them and each of them by said Otto F. Harley and for money had and received by them and each of them for the use of said Otto F. Harley during the life time of said Otto F. Harley. These Defendants further answering say that the Complainants are now jointly and severally indebted to the Estate of said Otto F. Harley in an amount equal to their respective joint and several claims against said Otto F. Harley and his Estate respectively for the use and occupation of the Lands of said Estate since the death of said Otto F. Harley and for money had and received by them and each of them for the use of and partly belonging to said Estate since the death of said Otto F. Harley. These Defendants further answering say that the promissory notes and single Bills mentioned in said Bill were and each of them was procured by the fraud of the Complainants individually and by their joint and concerted fraud. These Defendants further say that the promissory note

General
Replication

Agreement
to issue
Commence

Commence