Order of Court overruling motions

Joseph Byers
vs
A. F. Stein & wife

No. 3606 Equity.

In the Circuit Court for Frederick County, sitting as a Court of Equity.

The matter of the Defendants motion for the removal of this cause from the jurisdiction of this Court having been submitted by the respective Counsel it is thereupon ordered by the Court this 7th day of February A. D 1872 that the said motion be and the same is hereby overruled with costs to the Complainant

Filed Feby. 8 1872.

John A Lynch

Answer of A F Stein and wife

Joseph Byers
vs.
Abraham F Stein and Martha J. Stein his wife

No. 3606 Equity.

In the Circuit Court for Frederick County.

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

The answer of Abraham F Stein and Martha J. Stein his wife to the Bill of Complaint of Joseph Byers against them in the Circuit Court for Frederick County as a Court of Equity exhibited. These Defendants now and at all times hereafter saving and reserving to themselves and each of them all and all manner of benefit of exception to the manifold errors uncertainties and insufficiencies in said Bill of Complaint contained as if taken by demurrer or otherwise for answer to said bill of Complaint or unto so much thereof as they are advised it is material for them to answer, answering say that it is not true as stated in said bill of Complaint that these Defendants being indebted to the Complainant on 3rd day of October A D. 1868 in the sum of one thousand dollars did on the date aforesaid in or to secure the payment of said sum with the interest that might accrue thereon by their deed of mortgage convey unto the Complainant the Real Estate and personal property mentioned in said Bill of Complaint Now these Defendants deny that at any time since said date the Defendant Abraham F Stein was a resident of the State of Pennsylvania but they aver that he has always since said date been a resident of the State of Maryland. These Defendants further answering say that at the said date the Defendant Martha J Stein was not indebted to the said Complainant in any sum of money whatever and that the allegation in said Bill of Complaint to that effect is wholy false but that on the 16th day of October 1868 the Complainant endorsed a note for five hundred dollars for this Defendant Abraham F. Stein which he disposed of for his own use and benefit exclusively and also on said last date executed and delivered to this Defendant Martha J Stein a note payable in Sixty days for the sum of Three hundred and Eighty five dollars and fifty two cents and by a copy of said note hereunto filed marked Exhibit C appears, which with all other Exhibits hereunto filed these Defendants pray may be taken and considered as part of their answer and that the balance of the money making up the said pretended consideration of the thousand dollars in said alleged Mortgage mentioned was after said last date paid by said Complainant to this Defendant Abraham F. Stein without the knowledge consent or direction of this Defendant Martha J. Stein, further answering these defendants say that notwithstanding the fact which they here again repeat that this Defendant Martha J Stein did not at the date of the execution of said pretended Mortgage nor at any other time owe the Complainant any money whatever, every allegation in in said Bill to the contrary being false, she was forced and compelled against

"Exhibit
to Ans

Rule,
procee

Order
Cour