her will by threats and violent persuasions of her husband this Defendant Abraham J Stein to sign and execute said pretended Mortgage, and these Defendants further answering say that the Complainant was aware at the time of the execution of said pretended Mortgage of all the facts in the case, and for the purpose of entrapping this Defendant Martha J Stein into the payment of her husbands debts well knowing she was not indebted to him and that the affidavit to said Mortgage of the bona fide thereof was false, took advantage of her weak and helpless condition and caused her said husband in perpetuating a fraud upon her and her right of property and that the whole transaction conceived in iniquity and perpetrated in fraud presents such a case to the consideration of a Court of Equity and yor conscience as will justify and authorize it to prevent the consumation of a wicked scheme to wrong and injure this Defendant Martha J. Stein who has no redress but in a form where her interests are specially the subject and guardianship. And these Defendants pray that said Bill may be dismissed and the also hence dismissed with their reasonable costs and charges in this behalf wrongfully sustained &c

C. C. S. Levy
Jno E Smith
Sols for Defendants.

Filed March 19 1872.

"Exhibit C" to Answer.

Stamp. 20¢

Sixty days after date I promise to pay Martha J Stein or order Three hundred and Eighty five dollars and forty two cents for value received this 16th day of October 1868

Filed March 19. 1872.

Joseph Byers

Rule, further proceedings

Joseph Byers vs A. J Stein & Wife

No. 3606 Equity.
In the Circuit Court for Frederick County, in Equity

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

The Defendants having filed their answer in this cause on the 19th day of March 1872, and the Complainant not having proceeded further since said date pray your Honors to pass order requiring the Complainant to proceed further by the 4th day of the next term of this Court as provided by the 17th Rule of this Court, and as in duty bound &c

C. C. S Levy
Sol for Defendants.

Filed Sept 14. 1872.

Order of Court

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

No. 3606 Equity.
In the Circuit Court for Frederick County as a Court of Equity.

May Term 1872

Ordered this 14th day of September in the year 1872 by the Circuit Court for Frederick County as a Court of Equity and by the authority thereof that the Complainant proceed further in this cause by the 4th day of the ensuing September Term of this Court provided a copy of this order be served upon the Complainant or his Solicitor before the beginning of said September Term.

John A Lynch
Judge of the Circuit Court.

Filed Sept 14th 1872.