

proof thereof, these defendants further admit that the Real Estate whereof said Henry Shafer died seized or a large part thereof was sold under a decree of your Honorable Court, but your respondents have no notice or knowledge that any part of the proceeds of sale of such Real Estate have been received by the Trustee except the money paid by Mrs Grove. These respondents deny that the said Petitioner is entitled to claim the several claims preferred by him against the Estate of said Henry Shafer deceased as set forth in his Petition and in the Exhibits filed therewith marked Exhibits No 1 2, 3, 4. These respondents referring to the claims marked Exhibits No 3 and No 4 deny that the indebtedness therein set forth ever existed that said Henry Shafer was ever indebted to said Petitioner as therein claimed, and they aver that said claims if they ever existed (which these respondents deny) are stale and unjust claims without consideration and are barred by limitation the benefit of which statute of limitations they crave as if specially pleaded, and these respondents further state that all items in Exhibit No 3 subsequent to November 1871 accrued after the death of said Henry Shafer and constitute no claim against his Estate, these respondents further state that claim No 1 is barred by limitation the benefit which these respondents pray may be allowed them as if specially pleaded. These respondents further plead limitations to claim No 2 and deny that said claim is now owing and they deny that any of the said claims are just debts against the Estate of said Henry Shafer or ought be allowed out of the proceeds of sale of said Real Estate.

Samuel L Grove
Ann R Grove
E Talbot Shafer

State of Maryland Frederick County Jo.
On this 17th day of December in the year 1874 before me the undersigned a Justice of the Peace of the State of Maryland in and for Frederick County personally appeared E Talbot Shafer, Henrietta Shafer, Samuel L Grove and Ann R Grove and made oath in due form of Law that the matters and things stated in the foregoing answer are true as therein stated to the best of their and each of their knowledge information and belief
Dated Dec 18. 1874
Ezra Munnick J P

Petition of
Hannah Brier
Wife

John H A Shafer
Martin J Shafer et al
No 3911 Equity.
In the Circuit Court for Frederick County, as a Court of Equity.

Samuel L Grove & wife et al
To the Hon the Judge of the Circuit Court for Frederick County, sitting as a Court of Equity

The petition of Samuel G Brier and Albinia G Brier his wife respectfully shows unto your Honor that your petitioners are both of them defendants in the Bill of Complaint in this case.

That said Albinia G is mentioned and described in said Bill as a daughter of Henry Shafer dead now the wife of Saml G Brier

That a large portion of the Real Estate of Henry Shafer dead has by the trustees appointed by the decree in this case been sold by virtue of said decree.

That at said sale of said Real Estate to wit on the 31st day of February A. D 1874 your petitioner Albinia G Brier then being as she now is a feme covert and the wife of your petitioner Samuel G Brier was the highest bidder for a portion of said Land being that portion of said land which is in the trustee's first report of sales filed in this cause reported as sold to