

State of Maryland
 District Court, Frederick County, Md.

On this 19th day of November 1867, before me the subscriber Commissioner appeared Harriet Todd Guardian of Benjamin H. Todd and Jesse S. Todd the Infant Defendants and made Oath in due form of Law that the matters & things stated in the foregoing answer are true to the best of his knowledge and belief

(W. G. McSperson, Clerk
 Comr.

(Commissioner of D. returned and filed Nov. 19, 1867.

And the said Rachel S. Todd appeared in said Circuit Court here sitting as a Court of Equity and by William J. Ross and Charles W. Ross Esquires his Solicitors filed in Court the following answer to the said Bill of Complaint, to-wit:

Answer of Rachel S. Todd

The answer of Rachel S. Todd of the State of Illinois to the Bill of Complaint of Ruth Gore and Samuel C. Gore her Husband filed in the Circuit Court for Frederick County as a Court of Equity against herself and others.

Ans. Respondent: for answer to said Bill of Complaint, answers and says that he admits that the said Benjamin Todd was sometime in the Spring of the year Eighteen Hundred and Sixty Six married to the complainant then Ruth Gore and that they lived together as man and wife.

This Respondent further admits that the said Benjamin Todd died intestate in the Month of December in the year Eighteen Hundred and Sixty Six without leaving lawful issue and that the Parties named in said Bill of Complaint are his Heirs at Law.

Ans. Respondent further admits that said Benjamin Todd Intestate as aforesaid leaving both Real and Personal Estate but to what amount your Respondent has no knowledge.

Ans. your Respondent reserving and excepting to the manifold errors, omissions and inconsistencies in said Bill contained and further answering said Bill answers and says that your Respondent left the State of Illinois sometime in the autumn of the year Eighteen Hundred Sixty Six, at the earnest request and solicitation of his Brother Benjamin who wrote to your Respondent, urging him to come to the State of Maryland for the purpose of taking charge of his business, and that said Benjamin Todd was a man of advancing in years, blind and, for years had depended upon the services of an illegitimate son of the name of Jesse S. Todd in transacting his business, that at the time said Benjamin wrote to your Respondent urging him to come to Maryland, Jesse S. Todd was then almost in a pining condition and unable any longer to take care of his Father's business, or perform such services as his said Father required of him.

Your Respondent therefore came to the State of Maryland for the purpose of taking charge of the Property and Estate of his said Brother Benjamin, and at his request and not as has been falsely charged in said Bill for the purpose of defrauding and deceiving his said Brother Benjamin, and to defraud and cheat the Complainant out of her just and legal rights, and your Respondent denies ^{all such charges} as utterly false, malicious and your Respondent denies as utterly false the charge that he obtained possession of the said Bonds, Notes, Mortgages and choses in action described in said Bill of Complaint by any such false statements and fraudulent practices upon his Brother Benjamin but that said United States Bonds to the amount of Thirty five Thousand two hundred and Fifty Dollars, and said Mortgages, single Bills and promissory