

prayer to be hence dismissed with their reasonable costs as in duty bound
Filed February 6, 1877
Fredk J. Nelson
Sol for respondents

No. 4183 Equity.

Answer of
Lurisa
Griffith
Mollie
Griffith

The joint and separate answers of Lyde Griffith Lurisa Griffith his wife and Mollie N. Griffith to the bill of Complaint of John Hurd & Hiram M. Keefe trading &c as Hurd & Keefe filed against these defendants and others in the Circuit Court for Frederick County sitting as a Court of Equity in No. 4183 Equity.
These defendants say for answer they admit that Thomas Hammond was in his life time indebted to the complainants as alleged in said Bill and that he was at the time of contracting such indebtedness seized & possessed of a large and valuable real estate situated in Frederick Carroll and Howard Counties as in said Bill is alleged these defendants further admit that said Thomas Hammond being indebted to Richard H. Marshall Thomas Clagett and Mrs Ellen Nelson respecting as in said Bill is alleged did execute the Mortgage referred to and described in said Bill these defendants further admit that said Thomas Hammond was the 28th day of May 1874 executed his last will & testament wherein among other devises and bequests he did devise to his brother Dawson V. Hammond all of his "Home Farm" with the Exception of about ninety one & one half acres devised to his Sister Pauline Angel in Trust to permit one of these respondents Lurisa Griffith to occupy the same and in trust to pay over to her during her life for the sole and separate use the rents issues and profits thereof and after her death he did then devise said land to her children of whom one of these respondents Mollie N. Griffith is one and that the other provisions of said will are substantially as stated in said bill of complaint these respondents further admit that on the 13th day of June 1874 the said Thomas Hammond in consideration of love & affection & the sum of five dollars executed a deed of conveyance to Dawson V. Hammond of all the real estate of said Thomas Hammond lying & being in Frederick Carroll & Howard Counties and that complainants Exhibit No. 5 is a true copy of such deed these defendants further admit that the said Thomas Hammond at the time of the Execution of said deed was largely indebted to an amount exceeding the value of the personal property left by him and they admit that said deed was covinous and fraudulent as to the creditors of said Tho. Hammond whose claims and demands were in existence at the time of the execution of said deed and these respondents insist that said deed was not only covinous and fraudulent as to the creditors of said Thomas Hammond but was also covinous and fraudulent as to these respondents and the other devises of said Tho. Hammond under said last will & testament that said Thomas Hammond

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