

Devilbiss to the bill of complaint of Joseph Groff filed against these defendants & others in No. 4311 Equity in the Circuit Court for Frederick County. These defendants say for answer they admit that Maria Devilbiss did upon the 27th day of September A. D. 1876 for a valuable consideration convey all the interest in the Real Estate described in the proceedings in the said cause to these respondents Isaac Thos. Devilbiss Martha B. Kempf & Ann Catherine Devilbiss and that complainant's Exhibit, D, is a copy of the Deed whereby said Real Estate was conveyed to these respondents; that these respondents had said deed recorded among the Land Records of Frederick County on the 28th day of Sept. 1876. and subsequently thereto, to wit, on the 31st day of October A. D. 1876, the said Laura C. Devilbiss procured to be recorded among said Land Records what purported to be a mortgage from said Maria Devilbiss to said Laura C. Devilbiss of said Real Estate, dated the 23rd day of June 1876, for the sum of \$400. — that these respondents had no knowledge of said mortgage to Laura C. Devilbiss at the time they contracted with said Maria Devilbiss & obtained said Deed for said Real Estate and they are advised their said deed takes precedence to said mortgage these respondents further answering say they are credibly informed & do charge that the said deed of mortgage from Maria Devilbiss to Laura C. Devilbiss under which the complainant now claims was procured by fraud and is therefore Void. — As to the other matters & things charged in said Bill of Complaint these respondents say they have no personal knowledge there about & neither admit nor deny the same and pray to be there dismissed with their reasonable costs.

Filed May 9. 1878

Milton G. Turner
Sol for Respondents.

No. 4311 Equity.

Answer of
Maria
Devilbiss

The Answer of Maria Devilbiss to the bill of complaint of Jos. Groff filed against this defendant & others in the Circuit Court for Frederick County, sitting as a Court of Equity in No. 4311 Equity. This respondent says for answer that she admits that being seized & possessed of the Real Estate described in said Bill of Complaint and accompanying Exhibits, she did on or about the 21st day of June A. D. 1876 execute her deed of Mortgage conveying said Real Estate to Ezra Smith, to secure the payment of the money therein mentioned and thereafter, she executed a second mortgage not mentioned in said Bill of Complaint conveying her Equity of redemption to Alexander Beugle to secure to him the payment of the sum of \$ & interest & which said second mortgage was by said Alexander Beugle assigned to Jos Groff and by said Jos Groff assigned to said Ezra Smith, who now holds the same and this respondent further admits that on or about the 23rd day of June A. D. 1876 she agreed to execute a further mortgage upon said Real Estate to secure Daniel J. Devilbiss the payment of the sum of Two Hundred and fifty Dollars and said mortgage

Answer
Ezra
Smith