

Exhibits No. 1, 2, & 3, filed with the Bill, that he executed a last will and testament, of which Ex. No. 4, is a true copy that the provisions of said will are as alleged in the Bill, that Mary Zentmyer, widow of said Jacob Zentmyer is dead and that she never desired the executor named in said will, to sell the property mentioned in the Bill, as she was authorized to do, that the heirs at law of said Jacob Zentmyer Sr. are those named in the Bill, and those only, and that their places of residence are as stated, and that they are the same persons named in the said will.

They further admit, that Defendant Elizabeth Baker, wife of Jas. H. P. Baker, Mary Ann Hays and Nancy Klein, wife of George Klein retain their respective interests in said property. But deny that the said Abraham Creager and Sarah his wife, and John W. Snyder and Barbara Ellen his wife, still hold their respective interests in said property. On the contrary, these defendants aver, that since the filing of the said Bill, your Defendants Elizabeth Baker became possessed of the undivided interest of the said John W. Snyder and Barbara Ellen his wife, by deed duly executed and recorded in Liber T. G. No. 10, fo. 516, a certified copy whereof is herewith filed marked Exhibit A, which is prayed to be taken, together with all other Exhibits herewith filed, as part of their joint and several answers. And they further aver, that Defendant James H. P. Baker is possessed of the undivided interest of Jacob Zentmyer Jr. as alleged in the bill, and that since the filing of the Bill, he became possessed of the interest of said Abraham Creager and Sarah, his wife, as will appear by their deed duly executed and recorded in Liber T. G. No. 10, fo. 517, one of the Land Records of Frederick County, a certified copy of which is herewith filed and marked Ex. B. These Defendants admit that the said lands are not susceptible of division, that it would be to the advantage of all parties interested therein, to have the same sold under decree of your Hon. Court, and the proceeds thereof divided among them.

For the purpose, these respondents, claiming to be entitled as aforesaid, consent to a decree for sale as prayed. These respondents being owners of four sixths of the entire estate, pray the Court for equal representation in the trusteeship. And etc.

Moab Bowler

Filed January 4, 1879 For Jas. H. P. Baker & Elizabeth Baker.

Exhibit A to answer.

John W. Snyder } At the request of James H. P. Baker the  
 wife } following deed is recorded Dec. 3<sup>o</sup> 1878  
 To Copy of Deed } This Deed made this seventh day of  
 Elizabeth Baker } October, in the year Eighteen hundred and  
 seventy eight, by John W. Snyder and Barbara Ellen Snyder his  
 wife, of Washington County, in the State of Maryland, Witnesses,  
 that in consideration of Four Hundred dollars, current money,  
 the said John W. Snyder and Barbara E. Snyder, the wife of