

No. 4373 Equity.

The Plea of Peter Sahn, and Mary A. B. Sahn, his wife, to the Bill of Complaint of John A. Hegrange, guardian, against them, and others in Chancery exhibited.

These Defendants by protestation, not confessing, or acknowledging all or any part of the matters and things in the said Bill contained, to be true in manner and form, as the same are therein set forth, for plea, nevertheless to the said Bill do plead, and aver.

Plea of Peter Sahn & wife

That the said single bill in the Complainant's bill of Complaint specified, was the joint and several obligation of this defendant, Peter Sahn, Samuel Mought and John George Beerline, and that all of said parties, their executors, administrators, and personal representatives, are proper and necessary parties to any suit which may be brought against the devisee of the said J. Geo. Beerline in this Court, touching any of the pretended matters of Equity charged in said Bill.

Wherefore these Defendants pray the judgment of this Court, whether they shall be compelled to make any further or other answer to the said Bill of Complaint, and pray to be hence dismissed with their reasonable costs in this behalf most wrongfully sustained.

Noah Bowler
James W. Pearce
Sols. for Defs.

Filed Sept 12th, 1878.

John A. Hegrange, Guardian
of Manuel Hegrange
vs
Peter Sahn, Exr. of J. G. Beerline
Mary P. Beerline, et al.

No. 4373 Equity
In the Circuit Court for Frederick
County, sitting as a Court of Equity.

The plea of Mary P. Beerline, widow and devisee of John George Beerline, late of Frederick County, deceased, to the Bill of Complaint of John A. Hegrange, against her, and others in Chancery exhibited.

Plea of Mary P. Beerline

This Defendant by protestation, not confessing, or acknowledging all or any part of the matters and things in the said bill of Complaint contained, to be true in manner and form, as the same are therein set forth, for plea, nevertheless to the said bill, doth plead, and aver.

That the single Bill, upon which the said John G. Beerline, is alleged to have been indebted in his life time to the said Complainant, was a joint and several note, made by Peter Sahn, Samuel Mought, and the said John George Beerline and that all of said parties, their executors, administrators or personal representatives, are proper and necessary parties to any suit which may be brought against the estate of the said John George Beerline, in this Court, touching any of the pretended matters of Equity, charged in said Bill. And this defendant, further protesting for further plea, nevertheless to the said Bill, doth plead this her second plea and further aver.

That the said John George Beerline, made and signed said supposed single Bill, as surety for a certain Peter Sahn, who was in fact, the principal in said note, who received the money thereon, both of which facts, being well known and recognized by the said Complainant at the time of the making of said supposed single Bill. That after the making of the said supposed single bill. That after the making of the said supposed single bill, and after the same became due and payable, and before the institution of

Plea
And J
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