No. 4662 Equity

Bill of Complaint of Peter Seeger filed in the Circuit Court for Frederick County, sitting as a Court of Equity, against themselves and others.

Answers of August Werner Catharine Werner Theodore Brokey and wife

These Defendants for Answer to said Bill of Complaint answer and say that the said Valentine Werner and Catharine Werner his wife on the fifth day of February 1874 made and executed their Deed of Mortgage to the Complainant to secure the payment of the sum of One hundred and twenty five Dollars, due from said Valentine Warner to the Complainant, conveying the Real Estate therein described, and that Exhibits Nos. 1 & 2 filed with the Bill of Complaint are duly certified copies of the Deed to Valentine Warner for said property and the Mortgage aforesaid, and that the entire Mortgage debt with interest thereon is due owing and unpaid and these respondents further admit that the said Valentine Warner and Catharine Warner his wife are both dead, dying in the month of January 1881, within a few days of each other, and that the said Valentine Warner by his last Will duly admitted to probate in the Orphans Court of Frederick County devised all his Estate real and personal to his wife Catharine Warner for her life and after her death to his children Christian Wagner, your Respondents Catharine Herrick and Annie Brookey, and to Mary Seeger the wife of the Complainant, in the mode and manner and as set forth in said last Will and testament and that Exhibit No. 3 is a true certified Copy of said last Will. And these respondents further admit that the property mentioned and described in said Mortgage was the only property of any amount left by the said Valentine Warner and Catharine his wife — And that the personal estate left by them would not be sufficient to pay their funeral expenses.

And these respondents agree that a decree be passed by your Honorable Court for a Sale of said Mortgaged premises they declining and refusing to redeem the same

August Werner
Catharina Werner
Theodore Brokey
Anna Brookey

Filed Oct. 6, 1881

Peter Seeger
vs
Christian Warner
et al

No. 4662
In the Circuit Court for Frederick County in Equity

To the Honorable the Judges of the Circuit Court for Frederick County, as a Court of Equity

Answer of Christian Warner to Bill of Complaint

The answer of Christian Warner to the Bill of Complaint of Peter Seeger against him and others in this Court filed

This Respondent admits the allegations in the Bill of Complaint to be true and consents to the passage of a Decree as prayed.

Sept 28/81

Filed Oct. 6th 1881.

Jas M Shorb Solr for Sol.

To the Honorable the Judges of the Circuit Court for Frederick County sitting as a Court of Equity

The application of Mary Seeger, wife of Peter Seeger the Complainant in No. 4662 Equity respectfully states to your Honors, that she is one of the defendants in said cause that she has been duly summoned, and prays leave of the