No. 4662 Equity

Court that as one of said Defendants she may file her separate answer to said Bill of Complaint

Mavra Zinger

Courts Order

Ordered by the Court this fifth day of October, 1881, that leave be granted the Defendant Mary Seeger to file her separate answer to said Bill of Complaint.

John A. Lynch
Judge of the Cir. Court

Filed Oct. 6th/81

Answer of Mary Seeger

The separate answer of Mary Seeger wife of Peter Seeger, to the Bill of Complaint of Peter Seeger filed against herself and others in the Circuit Court for Frederick County sitting as a Court of Equity.

This Respondent for answer to said Bill of Complaint, answers and says. That Valentine Warner and Catharine Warner 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 for said mortgaged premises to said Valentine Warner, and the Mortgage aforesaid, and that the entire Mortgage debt with interest thereon, is due and owing to the Complainant.

And this respondent further admits that the said Valentine Warner and Catharine Warner died within a few days of each other in the month of January in the year 1881, and that the said Valentine Warner by his last will and testament 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 Warner, Catharine Herrick, Anne Brookey, and your respondent 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 this respondent further admits 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 this respondent agrees that a Decree be passed by your Honorable Court for a sale of said Mortgaged premises, your respondent declining and refusing to redeem the same

Filed Oct 6th 1881

Mavra Zinger

Peter Seeger
vs
Christian Warner, Theodore Barkey & wife et al.

No. 4662 Equity
In the Circuit Court for Frederick County, sitting as a Court of Equity.
September Term, 1881.

Decree to sell

The above cause standing ready for a hearing, and being submitted, the Bill, answers Exhibits and all other proceedings were by the Court read and considered.

It is thereupon this 6th day of October, in the year Eighteen hundred and eighty-one, by the Circuit Court for Frederick County, as a Court of Equity, and by the authority of said Court, adjudged ordered and decreed, that the land and premises mentioned in these proceedings be sold for the purpose of paying the Mortgage debt of the