

No 5123 Equity.

Frederick Kohlhaas and Sarah E. Kohlhaas, his wife -

No. 5123 Equity  
In the Circuit Court  
for Frederick County  
in Equity

Justus Martin et al  
The Complainants by way of replication to the Answer of Lycurgus Warfield and Hannah Warfield his wife say,  
1st That it is not true as alleged in the 4th Paragraph of said answer that the said Hannah Warfield was the only one of the children, who remained at home with her mother and rendered her support and assistance, that the other children married and left home many years before their Mother's death, that said Hannah remained single for a long time after attaining the age of twenty-one years, and that when she did marry and for a long time thereafter she remained at home with her mother rendering her assistance and taking care of her in the time of her age and infirmity; That the services were greatly over and above what were rendered by any of the other children, that at the time they were rendered the said Hannah designed to make a charge for such services and there was an expectation on the part of said Jane Kohlhaas to pay for the same 2nd That it is not true that the said Jane Kohlhaas at the time of her death was indebted unto the said Hannah Warfield in the sum of five hundred dollars or any sum whatever, as alleged in the 5th Paragraph of said Answer. 3rd That the claim set up in the 4th and 5th Paragraphs of said answer is stale and barred by the Statute of Limitations, on which statute these Complainants rely as a defense to the same - And as in duty bound &c

John C. Motter, Sol. for Complainants

Frederick Kohlhaas and Sarah E. Kohlhaas, his wife

No 5123 Equity.  
In the Circuit Court for Frederick County in Equity

Justus Martin and others

Petition and Court's order appointing guardian to answer for the

The petition of Frederick Kohlhaas and Sarah E. Kohlhaas, his wife, respectfully represents unto your Honors that the Infant Defendants Margaret Trail, Mollie Trail, Gatty Trail, Hanson Trail and Teresa J. Smith have been duly summoned to appear and answer the Bill filed in the above cause. Your Petitioner pray your Honors to pass an order appointing Wm. Nash Young Guardian to take the answers of the said Infant Defendants and answer for them and file the same in the above cause.

And as in duty bound &c.

John C. Motter - Sol for Complainants.

The above petition having been read and considered, it is thereon in open Court this 21st day of January 1886, Ordered by the Circuit Court for Frederick County, sitting as a Court of Equity that William Nash Young be and he is hereby appointed Guardian to take the answers and answer for the abovesaid Infant Defendants.

John A. Lynch  
Judge of the Cir. Court

Your perils  
me, chief  
and day

1.2. 1886  
for Clerk.  
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Replication of  
Frederick Kohlhaas  
& wife

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Hannah Warfield