

No. 5609 Equity

Answer

The Frederick County National Bank, a body corporate
Plaintiff

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Mary M. Quynn Executrix of
and sole devisee under the last will
of John T. Quynn deceased and others
Defendants

No. 5609 Equity

In the Circuit Court for Frederick
County in Equity

To the Honorable the Judges of the Circuit Court for Frederick County sitting as a Court of Equity.
The defendant Mary M. Quynn Executrix of and sole devisee under the last will of
John T. Quynn late of Frederick County deceased, for answer to the Plaintiffs Bill of
Complaint filed in this cause, says -

That she admits to be true the allegations contained in the first, second, third,
fourth, fifth, sixth and seventh paragraphs of the Plaintiffs said Bill of
Complaint, and that she hereby agrees and consents to the passage of a decree
for the sale of the Real Estate of the said John T. Quynn deceased as prayed
for in the Plaintiffs said bill, reserving however such rights as she may have
as the widow of the said John T. Quynn to a share or portion of the proceeds
of the sale of the said real estate, in the event that the estate of the
said John T. Quynn shall prove insufficient for the payment of his debts.
And this defendant agrees to abide by such decree as may be passed therein.

Mary M. Quynn
Executrix and sole devisee of John T. Quynn deceased

Filed November 7, 1889

Answer

The Frederick County National Bank
a body corporate, Plaintiff

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Mary M. Quynn, Executrix of and sole
devisee under the last will of John T. Quynn
deceased, Philip Reich and others
Defendants

No. 5609 Equity

In the Circuit Court for
Frederick County in Equity

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity.
The defendant Philip Reich for answer to the charges and allegations of the Plaintiffs
Bill of Complaint filed in the above entitled cause, says -

That he admits said allegations to be true as charged.
That as to the 4th paragraph of said Bill, in which this defendant, is particularly interested, he
admits that the said John T. Quynn was indebted to him in the sum of two thousand
dollars and that the same was secured by a Mortgage on his real estate and that Exhibit
No. 8, filed with said Bill, is a true certified copy of said Mortgage, and further that the said
Mortgage debt is still due and unpaid with the interest on the same from August 9th
A.D. 1889. And this defendant agrees that a decree may be passed for the sale of the
real estate of the said John T. Quynn as prayed - provided that his mortgage debt be paid
out of the purchase money according to its priority of lien.

Filed Nov. 7, 1889
Philip Reich

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