

No. 4998 Equity

that said indebtedness is old and stale and long since barred by the Statute in such case made and provided, and for defense to that part of said Bill, rely upon the statute as a bar to said alleged claim.

And to the Sixth Paragraph of said Bill of Complaint, the said respondents admit that said land cannot be divided among the said parties without loss and damage to all concerned, but these respondents are opposed to a sale at this time for the reason that their mother Matilda Russell is now very old and infirm, that she is opposed to a sale of the said land, will claim her dower therein, and that in such event, it will greatly depreciate the value of such property, and that at this time a sale would be greatly injurious to all.

And further, these respondents object to the frame of said Bill upon the ground that it is multifarious in its charges and allegations and while they admit the jurisdiction of your Honorable Court, in either particular, they pray that the said Complainant may elect to amend his Bill or that the same be dismissed as to these respondents

Charles W. Ross

Atty for Defendants

Filed August 4, 1884.

Answer

The Answer of Matilda Russell, widow of Anthony Russell to the Bill of Complaint of Sarah Russell filed in the Circuit Court for Frederick County in Equity against herself and others.

This defendant so far as she is concerned denies that she is willing that the real estate mentioned in said proceedings shall be sold free of her dower interest therein on the contrary she claims her dower in said lands and prays that proper proceedings may be taken by your Honorable Court to have the dower of this respondent laid off in said cause

Charles W. Ross

Atty for defendant Matilda Russell

Filed August 4, 1884

Supplemental Answer

Sarah Russell

Henry Russell wife  
of Sarah

No. 4998 Equity

In the Circuit Court for Frederick County  
in Equity

The supplemental answer of Elizabeth Russell, widow of Henry Russell Daniel Ellsworth Russell, Annis Schley surviving husband of Eliza Ann Schley formerly Eliza Ann Russell, John M. Russell and Isabella Russell his wife Lewis R. Russell Eugene Norris and Mary Amelia Norris his wife all of Frederick County Maryland and Catherine E. Russell of Washington D.C. respectfully state to your Honors that since the filing of their original answer to said Bill of Complaint Matilda Russell their mother has departed this life, and that Henry Russell has also departed his life leaving Elizabeth Russell his wife and two children Daniel Ellsworth Russell who is of age, and William Russell, who is an

Petition

Cont'd on the