No. 5031 Equity.

of conveyance of said date conveyed all his interest in said tract of land to these respondents, as will appear by said deed filed herewith marked Exhibit "E"

7 That said Philip Kuhn never had any other than an equitable interest on title in the two several parcels or tracts of land described or referred to in the several paragraph of Plaintiffs bill and on the thirteenth day of November A.D. 1854, did assign to these respondents for value received, all his interest in said two parcels or tracts of land as will appear by said assignment filed herewith marked Exhibits "D" & "E" respectively

8 That said Exhibits "A" "B" "C" "D" & "E" are filed as part of this answer are prayed to be considered as such, as fully as if here inserted in words and figures.

9. That neither said Mary Kuhn and Philip Kuhn had at any time any other than an equitable interest in the real Estate described in the Plaintiffs bill and these respondents are now the Equitable owners of all the interest said Mary Kuhn or said Philip Kuhn ever had to said real Estate or any part of the same.

10. That these respondents admit that the names of the children of said Mary Kuhn and Philip Kuhn are Correctly stated in the third paragraph of Plaintiffs bill.

11. These respondents say it is not material for them to answer the fourth or fifth paragraphs of said bill, because these respondents are the only parties having an interest in said real Estate. And having fully answered these respondents pray that said bill may be dismissed and they allowed their reasonable Costs so unjustly sustained &c.

Milton G. Urner
Edw. S. Eichelberger
Solicitors for the Defts

Samuel Frey
Sophia her X mark Frey

Filed July 6. 1875.

Exhibit A.

Exhibit "A"

at the Request of Jonathan D. English the following Deed was Recorded 3 September 1846.

This Indenture made this 28th day of August 1846 between Philip Kuhn & Mary Kuhn of the State of Maryland & Frederick County of the one part & Jonathan D. English of the County & State aforesaid of the other part, Witnesseth, whereas the said Philip Kuhn is largely indebted to several persons on Bond & otherwise & many Judgments rendered against for summary of the said debts & whereas the said Philip Kuhn is desirous that said debts should be paid &c. Now this Indenture Witnesseth that in Consideration of the premises & of the sum of five dollars Current money of the State of Maryland to them the said Philip Kuhn & Mary Kuhn by the said Jonathan D. English in hand paid at & before the sealing and delivery of these presents, the receipt whereof is hereby acknowledged the said Philip Kuhn & Mary Kuhn hath given granted bargained & sold unto the said Jonathan D. English in Fee simple, part of a tract of land lying and being in Frederick County & State of Maryland & Called Long Race Containing 30 Acres of Land more or less