No. 6131 Equity.

of them deny that the said Cordelia Eiler stripped herself of all her property for the purpose of defrauding her creditors out of their just claims.

5. These Respondents and each of them in response to the fifth paragraph of the Bill of Complaint deny that they conveyed all the real estate described in Exhibit No. 4 to Legia Blessing to secure the payment of fourteen hundred dollars which mortgage has been assigned to George P. Buckley, but aver that they only Convey to said Legia Blessing part of the said real estate to wit the tract of fifty nine and one half quarter acres therein mentioned.

6. In response to the sixth paragraph of the Bill of Complaint these Respondents and each of them deny that they Convey the real estate described in Exhibit No. 4 to one Eiler which mortgage has been assigned to George P. Buckley as is alleged in said paragraph.

7. These Respondents admit the allegations of the seventh paragraph of the Bill of Complaint.

8. In response to the eighth paragraph of the Bill of Complaint these Respondents and each of them deny that said Horatio Eiler was insolvent at the time of making said deed and bill of sale, and deny that said Conveyances were fraudulently made and deny that said Conveyances were made to hinder delay and defraud the plaintiff and the other creditors of Horatio Eiler out of their just and lawful debts, and they deny that said Conveyances are void and were made for Considerations not bona fide but on the Contrary aver that said Conveyances were made for bona fide Considerations, and said Susan M. Eiler further says that she is a purchaser for bona fide, valuable considerations without notice or knowledge of any improper or unlawful design intent or purpose on the part of said Horatio Eiler, if any such design intent or purpose existed.

These Respondents having fully answered pray to be hence dismissed with reasonable Costs and as in duty &c

Charles V. S. Levy
Solicitor for Respondents
Horatio Eiler and Susan M. Eiler.

Filed August 4th 1893.

Appearance Entered

"Order to Enter Appearance".

William H. Wagner
vs
Horatio Eiler
and wife. et al

No. 6131 Equity
In the Circuit Court for Freemont County
in Equity.

John L. Jordan Esq. Clerk
Enter my appearance for Horatio Eiler and wife
18 July 1893.
Filed July 18th 1893.

Charles V. S. Levy.
Solicitor