Answer of Samuel P. Thomas

No. 6082. Equity.

Answer of Samuel P. Thomas

The Answer of Samuel P. Thomas, administrator of the goods and chattels of E. Keefer Thomas deceased to the Bill of Complaint of the Central National Bank of Frederick filed in the Circuit Court for Frederick County as a Court of Equity, against himself and others.

This respondent for answer to said Bill, answers and says:-

That he admits that the personal estate of the said E. Keefer Thomas is insufficient for the payment of his debts and that it will be necessary that the real estate, of which the said E. Keefer Thomas died seized and possessed, should be sold for the payment of the same.

And this respondent admits that the said E. Keefer Thomas was indebted to the Central National Bank of Frederick in the amounts as stated and charged in said bill and that said E. Keefer Thomas was in his lifetime seized and possessed of the real estate in said Bill described and set out in the deeds filed therewith as exhibits.

And further admits that the said E. Keefer Thomas left surviving him a widow, Evelina V. Thomas and two Children namely Samuel P. Thomas and Alice T. Anderson and two grandchildren namely, Frank Butler and Virginia T. Butler, Children of Virginia Butler, a deceased daughter.

And this respondent agrees to the passage of a decree by the Circuit Court for Frederick County, sitting as a Court of Equity, for the sale of the lands mentioned and described in said proceedings.

Saml P. Thomas.
administrator

Filed April 3, 1893.

Answer.

Answer of Alice T. Anderson.

The answer of Alice T. Anderson of Washington City, D. C. to the Bill of Complaint of the Central National Bank of Frederick filed in the Circuit Court for Frederick County, in Equity, against herself and others.

This respondent for answer to the various charges and allegations contained in said Bill of Complaint and the various paragraphs thereof, answers and says:-

That she admits that the said E. Keefer Thomas was in his lifetime indebted unto the Central National Bank of Frederick in the amounts as stated and charged in said Bill of Complaint and that the said E. Keefer Thomas was in his lifetime seized and possessed of the real Estate in said Bill described and set out in the deeds or copies thereof, filed therewith as exhibits.

And this respondent further admits the indebtedness of the said E. Keefer Thomas to John H. Williams as mentioned and described in said Bill and the execution of the mortgages as therein set forth to secure the same.

And this respondent further admits that said E. Keefer Thomas left surviving him a widow Evelina V. Thomas and the Children and grandchildren his heirs at law, as set forth and named in said Bill, and further admits that the personal estate of the said E. Keefer Thomas is