

No 7927 Equity

Answer of William Kemp

Filed, Sept 14<sup>th</sup> 1905.

Re. Felix Adams et al	} No 7927. Equity. In the Circuit Court for Frederick County. in Equity.
vs Joseph H. Adams et al	

To the Honorable the Judges of the said Court  
The answer of William A Kemp to the Bill of Complaint of the Felix Adams and others in this Court exhibits him and others says:

- 1 That he admits the allegations in the first paragraph of said bill.
- 2 That he neither admits nor denies the allegations of the second paragraph of said bill and asks full proof of the same.
3. That he admits the allegations of the third paragraph of said bill.
4. That he admits the allegations of the fourth paragraph of said Bill.
5. That he denies that Joseph H. Adams is indebted to the estate of Annie M Adams as set forth in said paragraph and that such advancements were made as therein set out and demands full proof of both, but admits that the said Joseph Adams is indebted to George L. Gillelan to the amount and in the manner set out in the said paragraphs of said bill not having any knowledge of the same.
6. That he denies the allegations of the ninth paragraph of said Bill and demands full proof and further aversing the same says that said alleged deed of Joseph H Adams was made if made at all while he was heavily indebted to third parties and without consideration and was and is a fraud upon his Creditor.
8. That he admits the allegations of the 10th and 11th paragraphs of the Bill of Complaint.

And is in duty bound etc,  
Vincent Sebree, Attorney for William A. Kemp, Defendant.