

2d. That the said Sarah E. Woodcock is alleged to have acquired title to said real estate under a deed from Mary Woodcock to her the said Sarah E. Woodcock, dated August 18, 1909, a certified copy of which is filed as Exhibit C, to the Bill of Complaint, and from which it will appear that said deed was recorded among the land records of Frederick County on the 21st day of September, 1909.

3. That there is due and owing unto your petitioner a balance of Three hundred and thirty-one dollars and twenty-four cents, (\$331.24) with interest thereon from July 31 1914 on a mortgage debt of Mary E. Woodcock and Charles S. Woodcock, secured by a mortgage debt on the 9th day of September 1909, in liber S. T. H. no. 289 folio 61 &c., one of the land records of Frederick County; which mortgage conveyed to your petitioner the real estate mentioned in the proceedings in this cause, and the balance of which said mortgage indebtedness constitutes a first lien on said real estate.

4th. That your petitioner, although a holder of a first lien on said real estate to the extent of the balance due as aforesaid on the mortgage above mentioned, has not been made a party to this cause.

Wherefore your petitioner prays your Honors that it be permitted to come in and be made a party to the cause, and that the balance due it on the mortgage aforesaid be paid out of the proceeds of sale, in the order of its legal priority.

And for such other or further relief as the nature and equity of its case may require, etc.

John S. Newman.

Solo. for Petitioner.

The foregoing petition having by the Court been read and considered, it is thereupon this 2nd day of September, in the year nineteen hundred and fourteen, by the Circuit Court for Frederick County, sitting as a Court of Equity, and by the authority thereof, adjudged, ordered and decreed that the Real Estate and Improvement Company of Baltimore City be and it is hereby made a party defendant to this cause. And it is further adjudged and ordered that the balance due said Real Estate and Improvement Company of Baltimore City, on the mortgage mentioned and referred to in the foregoing petition, be paid out of the proceeds of sale of the real estate mentioned in the proceedings in this cause and conveyed by said mortgage, on the order of its legal priority.

Glenn H. Worthington.

JOINT AND SEVERAL ANSWER OF CHARLES S. WOODCOCK, MARY E. FLORA & CLIFTON FLORA, HER HUSBAND, ROSA L. WOODCOCK & WM. J. WOODCOCK HER HUS. & ALLEN WOODCOCK.

The Joint and several answer of Charles S. Woodcock, Mary E. Flora and Clifton Flora her husband, Rosa L. Woodcock, her husband, & Allen Woodcock to the Bill of Complaint filed against them and others in the above entitled cause.

These defendants answering said Bill answer and state--

1st. That they neither admit nor deny the alleged indebtedness of Sarah E. Woodcock to Luther C. Ahalt on a promissory note dated January 22, 1914, but call for full proof of the same; that they deny the alleged indebtedness of twenty-eight dollars (\$28.00) from Sarah E. Woodcock to Thomas T. Barker on a note dated February 24, 1909, and allege that said indebtedness was included in a magistrate's judgment subsequently obtained by Thomas T. Barker against the said Sarah E. Woodcock; that they deny the existence of two magistrate judgments in favor of Thomas T. Barker aggregating about Two Hundred and Twenty-Five dollars (\$225.00) as alleged in the bill and say that if the said Thomas T. Barker holds magistrates judgments