

3. This respondent admits the matters and things in paragraphs Nos. Ten and Eleven and neither admits nor denies the matters and things alleged in paragraphs Nos. twelve and Thirteen of said petition, but alleges that the same does not effect her title or interest in this cause and denies that she owes either Elmer E. Mateny or Thomas Clinton Mateny anything whatsoever in reference to the said property.

4. This respondent denies the matters and things alleged in the fourteenth paragraph of said petition.

5. Answering the fifteenth paragraph of said petition this respondent admits that Elmer E. Mateny has been a tenant and occupant of said property for the least _____ years and has not paid any rental whatsoever and alleges that a reasonable value of the said rental would be about Seventy five dollars per year for the time that he has occupied the same.

6. And furthering answering said petition this respondent says, that her husband, William Gardner, who was a resident of the State of Pennsylvania and a non-resident of the State of Maryland, is dead and left surviving him as his heirs at Law William A. Gardner 111 aged 21 years Wilkinsburg Pa, Nellie L. Gardner, aged nine years, Elizabeth E. Gardner, aged fourteen years, and Lorenzo S. Gardner aged five years, all residents of 416 Hawkins Avenue, Braddock, Pennsylvania, all minors being under the age of twenty-one years, except Wm. A. Gardner 111 also leaving surviving ~~to~~ him a widow, this respondent, Mrs, Evelyn M. Gardner, of the same address.

7. And further answering said petition this respondent says, that the aforesaid purchase money for said property with interest thereon has been fully paid and satisfied by her as aforesaid and that the said parcel of land estate mentioned and described in said petition should not be resold for the purpose of raising the same, as it was fully understood between the said Lorenzo Gardner, deceased, who was the purchaser of said property and her husband that this respondent was fully entitled to have the same for services rendered and taxes paid as aforesaid.

Wherefore this respondent prays to be hence dismissed with her reasonable costs. And for such other and further relief as the nature of her case may require.

And as in duty bound, etc,

Evelyn M. Gardner
RESPONDENT.

A D. Willard
Sol'r for respondent

State of Maryland, Frederick County, to-wit:-

I hereby certify, that on this 21st, day of July, in the year nineteen hundred and fifteen, before me, Clerk of the Circuit Court for Frederick County and said State of Maryland, personally appeared Evelyn M. Gardner, and made oath in due form of law that the matters and things contained in the foregoing answer are true to the best of her knowledge, information and belief,

Filed Aug. 2-1915.

Harry W. Bowers, Clerk.

Thomas Clinton Mateny, Assignee of
Franklin Savings Bank,
VS.
Maud Gardner and Elmer E. Mateny.

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No. 7479 EQUITY.
In the circuit Court for Frederick County,
sitting in Equity.

TO THE HONORABLE THE JUDGES OF THE CIRCUIT COURT FOR FREDERICK COUNTY, SITTING IN EQUITY:

The general replication of Thomas Clinton Mateny, Assignee of the Franklin Savings bank of Frederick, to the answer of Evelyn Maud Gardner in the above entitled case respectfully shows,

That the plaintiff joins issue on the matters alleged in the answer of said Evelyn Maud Gardner, so far as the same may be taken to deny or avoid the allegations of the Petition filed by the plaintiff.

Filed August 2-1915.

T.C. Mateny
Assignee of Franklin Savings Bank.