

2. Answering the Ninth Paragraph of said Petition this Respondent admits that he is the surviving husband of the said Sophia M.A. Hall, formerly Kolb, and that he has purchased the interests of Alfred B. Kolb, the father of said Petitioners by the Deed of assignment duly executed and recorded and he files herewith a certified copy of said deed as part hereof marked Exhibit B.
3. And answering the Tenth Paragraph of said Petition this Respondent says that the said Alfred B. Kolb, did, at the time of the execution of said deed of assignment, have a vested interest in said real estate and in the proceeds of sale to arise therefrom and in the residuum of the estate of the said testator, which interest was conveyed to this respondent by said deed, and that said deed is not null and void as alleged in said paragraph, but on the contrary is valid and effective for the purpose of conveying said interest to this Respondent.
4. And answering the eleventh paragraph of said petition he admits that the said Naomi Utermehle is dead and that she left a son, Charles H. Utermehle of Washington, D. C. as her only heir at law, but he denies that the power to sell said real estate vests in the said Charles H. Utermehle according to the true and proper construction of said will and Codicil, and he also denies the allegations that the Court is without jurisdiction to appoint Trustees to sell said real estate.
5. This Respondent admits that he is a non-resident of the State of Maryland and that he is a resident of the District of Columbia.
6. And furthering answering this Respondent avers that Daniel Kolb, the testator in these proceedings mentioned, and who died in the year, 1882, left surviving him the following brothers and sisters as heirs at law, viz:-
- (1) Naomi Utermehle who is now dead.
 - (2) Sophia M.A. Kolb, the life tenant mentioned in these proceedings and who married this Respondent.
 - (3) Louisa C. Whitaker, who lives in Washington, D.C.
 - (4) Alfred B. Kolb, who died since the testator,
 - (5) Jacob M. Kolb, who died since the testator,
 - (6) Joseph B. Kolb, who died since the testator, and
 - (7) Lewis A. Kolb, the original Petitioner on these proceedings.
7. That the interest of the said Naomi Utermehle in the real estate and proceeds of sale mentioned in the proceedings was conveyed and assigned to your Respondent, Ralph L. Hall, as will appear by Exhibits A, & B. herewith filed.
8. That the said Louisa C. Whitaker also conveyed and assigned her interest in said land and proceeds of sale to your Respondent, Ralph L. Hall, as will appear by Exhibit C. herewith filed.
9. That the only heir at law and next of kin of the said Jacob M. Kolb likewise conveyed and assigned all of her interest in said land and proceeds to said Respondent as will appear by Exhibit W. herewith filed.
10. That upon the death of the said Sophia M.A. Hall, her interest as one of the heirs at law of the said testator became vested in her children, Marquerite Hall and Ruth C. Hall, they being also the children of the said Ralph L. Hall, so that this Respondent and his said two children are the owners of five-sevenths (5/7) of the entire subject matter of these proceedings.
11. That the Trustees appointed on July 23rd. 1915, to make sale of said real estate at the instance of Lewis A. Kolb, the owner of the one-seventh (1/7) interest in said farm and proceeds of sale have already advertised said land for sale on the 21st day of August, 1915, as will appear by a copy of their advertisement herewith filed marked Exhibit F.
12. That your Respondent believes and alleges that the Court was not advised as to all the facts and circumstances of the case as it should have been at the time