

No, 10026, Equity,

GENERAL REPLICATION,

In the Circuit Court for Frederick County

In Equity,

William E. Watkins, et al.,	O	
vs,	O	
William E, Watkins, et al.,	O	No, 10026 Equity,
	O	

To the Honorable the Judges of said Court,;
 The Complainants in the above cause, for replication to the Defendants answers Says;
 That they join issue with the Defendants on their Answers so far as the same, may
 be taken to deny or avoid, the allegations of their said Bill of Complaint,

H. K. DeLauter,
 Solicitor for Complainants,

Petition and Courts Order to Take Testimony

IN THE CIRCUIT COURT FOR FREDERICK COUNTY,

IN EQUITY,

William E, Watkinset al.	o	
vs,	o	No, 10026 Equity,
William E, Watkins, et al.,	o	
	o	
	o	

To The Honorable, The Judges of said court;-
 The petition of the Complainants respectfully represents,
 The Pleadings, in this Cause, are at issue, and the Complainants desire to take
 Testimony, before One of the Standing Examiners, to prove the allegations in their Bill of
 Complainant,

Wherefore your Petitioners pray for leave to take testimony before one of the
 Standing Examiners, of this Court,;

H, K, DeLauter,

Solicitor for Complainants,

Ordered this 5th day of September, 1919, by the Circuit Court, for Frederick County,
 Sitting in Equity, that leave be granted to the parties to this cause, to take testimony before
 any one of the Standing Examiners of this Court, to support the allegations of the Bill of
 complaint,

Glenn H. Worthington,

T E S T I M O N E Y

William E, Watkins, et al.,	O	No, 10026, Equity,
Vs,	O	In the Circuit Court for Frederick County,
William E, Watkins, et al.,	O	In Equity,
	O	

To The Honorable the Judges of said Court;-

The above cause being at Issue, and Notice having been given me. by the Solicitor for the
 Complainant, of a desire to take testimony in said Cause, leave of the Court having first been
 had, and obtained, I. D. Princeton Buckey, One of the Standing Examiners of the Circuit Court,
 for Frederick County, Maryland, duly appointed qualified and sworn. met at the law office of
 H. Kieffer DeLauter, Esq; in Frederick City, Maryland, on Saturday the 6th, day of September
 1919, at the hour of 11-0. Clock, A.M, and then and there proceeded to take the following
 depositions, that is to say,

Present; H. K. DeLauter, Esq;

Solicitor for Plaintiffs,

and the Witnesses,

Mrs, Estelle, Watkins, a witness of lawful age. produced on the part of the Plaintiff, having
 First been duly sworn, deposes and says,

My name is Mrs Estelle Watkins, and I am one of the Plaintiffs, and I am 36 years old, and
 the widow of the late William Ernest Watkins, and the Mother of the infant, Defendants, William
 Ernest watkins, age 9 years, on December 20th, last, Margaret E, Watkins, age 8 years, on July 5
 last and Robert W, Watkins, aged 6, years on July 13th, last, all of said infants reside with me
 at Kemptown, Frederick County, Maryland, the said William Ernest Watkins departed this life jany
 16th, 1915, leaving me as his surviving Widow, and the above named infants, as his only heirs,
 at Law, that at the time of his death, he was the owner of a farm, in Urbana District Frederick
 County, Maryland, containing 127 acres, of Land, more or less, and which is described in Exhibit
 S, W, now shown me, which is a certified copy of the deed to said property, of William Ernest