

John I.A.Lambert et al.
vs.
Frances May Lambert Infant
et al.

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No.10358 Equity.
In the Circuit court for
Frederick County,sitting in
Equity.

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THE ANSWER OF Frances MAY Lambert infant under the Age of twenty-one years,by John H. Marts Guardian ad Litem,to the Bill of Complaint of John I.A.Lambert et al against Frances May Lambert et al in the circuit Court for Frederick County,sitting as a Court of Equity exhibited.

The Defendant cannot admit any of the matters and things alleged in the Bill,and being infant of tender years,submit her rights to the protection of this Court.

(Filed May 18-1921)

John H.Martz
Guardian Ad Litem.

T E S T I M O N Y .

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vs.
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The above entitled cause being at issue and notice having been given me by the Solicitor for the Plaintiff of his desire to take testimony therein,I.Clayton O.Keedy,one of the standing Examiners of said Court duly appointed,qualified and sworn,having assigned the 3rd day of June A.D.1921 at my office in Frederick City as the time and place for taking the testimony in this cause,and having due notice thereof to the parties concerned,did at the appointed time and place proceed to take the following testimony to-wit;- The Plaintiff filed with the examiner as evidence Exhibit A.& B,which are herewith returned by the Court Examiner.

John I.A.Lambert a witness of lawful age produced on the part of the plaintiff being duly sworn and examined Viva Voce deposes and says as follows;-

My name is John I.A.Lambert; my age is 33 years;and I reside in Rockville,Monggomery County Maryland,I am one of the Plaintiffs in this case.Annie F.Lambert,the other Plaintiff is my wife and the infant Frances May Lambert is my daughter by a former marriage.Her mothers name was Grace E.Lambert and she died in Feby.1915,intestate and she is the Grace E.Lambert who is mentioned in the deed filed in this case as Exhibit A.

On the 27th of Sept,1911,we purchased of Annie Elizabeth Cramer and Joseph C.Cramer her husband,a dwelling house and lot of land situated on the South side of West South Street in Frederick,Md,and which was conveyed to us as tenants in common by the deed filed herein and marked Exhibit A.we had but the one child who is now living by my wife Grace E.Lambert a daughter Frances May Lambert who is now 8 years of age and she lives with me in Rockville.On Nov,19th 1920 my present wife Annie F.Lambert and myself entered into an agreement with one Howard H.Hartman of Frederick to sell to him the house and lot mentioned in Equity Exhibit A.The agreement itself is herewith filed as Exhibit B. He agreed to pay \$1800.for the property and has paid \$400.on the purchase.

This is a fair and reasonable price for the property and all that it could be expected to bring if offered at public sale. The property is not susceptible of division or partition between my daughter and myself without loss and injury and it would be to the benefit and advantage of all the parties concerned,especially the infant,for said