

The Answer of Calvin Beard, to the Bill of Complaint of Thomas F. Filler and others, in your Honorable Court against him and others exhibited.

THIS RESPONDENT SAYS;

FIRST; That having no knowledge of the allegations contained in the First, Second, Third, Fourth and Sixth Paragraphs of said Bill of Complaint, he neither admits nor denies the same.

SECOND; That he admits that he resides near Walkersville, in Frederick County, Maryland, as alleged in the Fifth Paragraph of said Bill of Complaint.

THIRD; That he admits that Exhibit No. 1 is a certified copy of the deed from Solomon Filler, et al. to Daniel H. Filler, et al. bearing date June 7, 1885, and recorded in Liber T.G. No. 3 folio 534, one of the Land records of Frederick County, Maryland, as alleged in the Seventh Paragraph of said Bill of Complaint.

FOURTH; That having no knowledge of the allegations contained in the Eighth Paragraph and Ninth Paragraphs, he neither admits nor denies the same.

FIFTH; That he admits, as alleged in the Tenth Paragraph, that the property was advertised by Thomas F. Filler, Agent, for sale, at public auction, to be held on Saturday, March 14, 1925, but, having no knowledge as to the other allegations contained in the Tenth Paragraph of said Bill of Complaint, he neither admits nor denies the same.

SIXTH; That he admits the allegations contained in the Eleventh Paragraph of said Bill of Complaint.

SEVENTH; That having no knowledge of the allegations contained in the Twelfth Paragraph of said Bill of Complaint, he neither admits nor denies the same.

EIGHTH; That he admits that Exhibit No. 3 is a certified copy of the Mortgage from Daniel H. Filler, et ux, to Warner Hobbs, bearing date March 1, 1886, and recorded in Liber W.I.P. No. 2, folio 191, one of the Land Records of Frederick County, Maryland, which appears to have been assigned to Mary E. Sappington, as alleged in the Thirteenth Paragraph of the said Bill of Complaint.

NINTH; That he admits the allegations contained in the Fourteenth Paragraph of the said Bill of Complaint.

TENTH; That he admits the allegations contained in the Fifteenth Paragraph of the said Bill of Complaint.

WHEREFORE, having fully answered, he prays that the said Sale may be ratified, except that he desires to have the deed, conveying the said property, made to himself, the said J. Calvin Braed, and Myrtle M. Beard, his wife.

And as in duty, etc.

J. C. Beard.
Defendant.

State of Maryland, Frederick County, Sot;

I hereby certify that on this 5th day of June, 1925, before me, the subscriber, a Notary Public, duly commissioned and qualified, in and for the State and County, aforesaid, personally appeared J. Calvin Beard, to me personally indentified as the Calvin Beard, one of the Defendants, in the above entitled cause, and, in my presence, duly signed and acknowledged the foregoing Answer as his act.



(Filed June 5, 1925)

M. Margaret Marsh.
Notary Public.

ANSWER OF MARY E. SAPPINGTON.