

TO THE HONORABLE, THE JUDGES OF SAID COURT;

The petition of the complainant, William M. Barker, respectfully represents;

That two of the defendants, Virginia Wood and Patricia Allbright, returned as summoned in the above cause, are infants under the age of twenty-one years of age, and therefore can not appear and defend themselves in said cause.

Wherefore your petitioner prays for the appointment of some suitable person to act as guardian as litem for said infants in this cause.

H. K. DeLauter
Solicitor for Complainant.

Ordered this 20th day of March, 1929 by the Circuit Court for Frederick County, sitting in Equity, and by the authority thereof, that John H. Martz, be, and he is hereby appointed guardian ad litem for the infant defendants in the above cause, Virginia Wood and Patricia Allbright, to appear and defend for them in said cause.

(Filed March 20, 1929)

John S. Newman

ANSWER OF JOHN H. MARTZ GUARDIAN.

William M. Barker	"	No. 11811 Equity.
Vs.	"	In the Circuit Court
	"	For Frederick County,
Moses C. Allbright	"	Sitting as in Equity.
Virginia Wood	"	
Patricia Allbright	"	

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THE ANSWER OF Virginia Wood and Patricia Allbright infants under age of twenty-one years by John H. Martz Guardian Ad Litem, to the Bill of Complaint of William M. Barker against them in the Circuit Court for Frederick County, sitting as a Court of Equity exhibited.

These Defendants cannot admit any of the matters and things alleged in the Bill and being infants of tender years, submit their rights to the protection of this Court.

(Filed March 20, 1929)

John H. Martz
Guardian Ad Litem.

T E S T I M O N Y.

William M. Barker	"	No. 11811 Equity.
vs.	"	In the Circuit Court for
	"	Frederick County, in Equity.
Moses C. Allbright, et al.	"	
	"	

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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 Plaintiff of a desire to take testimony in said cause, leave of the Court having been first had and obtained, I. D. Princeton Buckey, one of the Standing Examiners of your Honorable Court, duly appointed, qualified and sworn, met the parties to said cause and the witnesses at the law office of H. Kieffer DeLauter, Esq., in Frederick City, Maryland, on Wednesday, March 20, 1929, at the hour of 2.30 o'clock p.m. and then and there, in the presence of the solicitor for the Plaintiff and the witnesses, proceeded to take the following depositions, that is to say;

Present; H. Kieffer DeLauter, Esq.,

Solicitor for Plaintiff,
and witnesses.

William M. Barker a witness of lawful age, the Plaintiff in this case testifying in his own behalf, being duly sworn by the Examiners, deposes and says;

My name is William M. Barker, I reside in Brunswick, Frederick County, Maryland, I am the Plaintiff in this case and am the father of Donna Mae Wood, who afterwards married Moses C. Allbright and died, intestate, on or about the 21st day of August, 1928.

Donna Mae Weed Allbright was formerly Donna Mae Wood. Mr Wood, her first husband, died in