ANSWER OF CORA B. GUYTON.

N. Charles Graybill and	"	No. 12,129 Equity.
	"	
Mary C. Graybill, his wife,	"	In the Circuit Court for
	"	
vs.	"	Frederick County,
	"	
George W. Hull and	"	In Equity.
	"	
Martha R. Hull, his wife,	"	
	"	
Cora B. Guyton, et al.	"	
	"	

- - - - -0- - - - -

To the Honorable, the Judges of said Court:

The Answer of Cora B. Guyton, widow of Edgar G. Guyton, and one of the Defendants in the above cause, respectfully shows:

1

That she admits the allegations contained in paragraphs Nos. 1, 2, 3, 4, 5 and 6 of the Bill of Complaint.

2

This Defendant, in answering the 7th paragraph of said Bill, admits "that all of said real estate now owned by said N. Charles Graybill, George W. Hull (who is now deceased) and said heirs at law of Edgar G. Guyton, as tenants in common, and cannot be divided, without loss and injury to the parties entitled to interests therein, and it would be to the interest and advantage of all the parties to have said real estate sold and the proceeds divided;" but in further answering said paragraph this Respondent says, that when a decree may be passed for a sale of said lands herein mentioned, that a Trustee should be appointed by your Honorable Court, representing the interests of herself and her said minor children, which interest consists of a three-eighths value of the whole, and that when a sale thereof is made, it should be at a time that would be most advantageous to this Respondent and her infant children, so that the best and highest price may be obtained therefor.

3

That in answering the eighth paragraph of said Bill, this Respondent admits that George W. Hull, who recently died, was an aged man and manifested little, if any, interest in the management of said property and especially the orchard, or the receipts or expenditures thereon, and that ever since the death of her husband, Edgar G. Guyton, on October 30, 1923, the said N. Charles Graybill has had full and complete charge and management of said lands and the peach and apple orchards, for more than seven years, and that he has made sale of all apples, peaches and products from said lands, that he has received all the receipts for the sale thereof, and made disbursements thereof, and has made no satisfactory accounting to her, over the entire period of time, and that he has not paid any of the money received from said crops or any profit therefrom, excepting the sum of Twenty-eight hundred and sixty dollars ($2860.00), since the year 1923, nor has he rendered any statement of disbursements made by him, although she has often requested him to do so, And further answering says, that said orchard and lands have been productive for ten years or more, as the apple orchard is now and has been in full strength for ten years or more, and consists of about 10,000 trees.

4

That in answering the 9th paragraph of said Bill, this Respondent admits that much of the land, described in Exhibits Nos. 1 and 2, is planted in apple and peach trees, which require from time to time the attention of an experienced fruit grower, but denies that ir requires an experienced or high powered salesman to dispose of apples and peaches that have been grown upon said lands.