

1. That your Petitioners admit all the allegations contained therein, and consent to the passage of a decree by the Court appointing a Trustee for the sale of the real estate therein mentioned, reserving the right to share in the proceeds therefrom as an heir at law of James O. Harne and Annie M. Harne, his wife.

Creola V. Winfield

Cyrus Winfield

(filed January 29, 1929)

ANSWER OF EMMA C. GROFF, MORTGAGEE.

W. D. L. Harne and Katie S. Harne,	:	No. 11,779 Equity.
his wife, et al.	:	
	:	In the Circuit Court
vs.	:	
	:	For Frederick County,
Creola Winfield and Cyrus Winfield,	:	
her husband, et al.	:	In Equity.

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TO THE HONORABLE, THE JUDGES OF SAID COURT:-

The answer of Emma C. Groff to the Bill of Complaint and Amendment thereto respectfully shows unto your Honors:-

1. That your Respondent is the holder of a mortgage dated the 8th day of February, 1898, and recorded in Liber D.H.H. No. 2, Folio 212, one of the Land Records of Frederick County, originally made by James O. Harne and Annie M. Harne, his wife, to Charles Wertheimer, and subsequently assigned unto your Respondent.

2. The aforesaid mortgage was executed unto the original mortgagee to secure the payment of the sum of Two Thousand Five Hundred Dollars (\$2,500.00), and assigned unto your Respondent for the same consideration; that no sums whatever have been made on account of principal, and interest is payable thereon every six months, and interest is due from August 8, 1928.

3. That the mortgage of your Respondent conveys the following parcels of land;

A. 120½ acres of land conveyed to James O. Harne by Samuel P. Bussard, described in Bill of Complaint as Exhibit "I".

B. 36½ acres of land conveyed to James O. Harne by Henry Show, described in Bill of Complaint as Exhibit "J".

C. 19½ acres of land conveyed to James O. Harne by Cyrus C. Shuff, described in Bill of Complaint as Exhibit "K".

D. 25 3/4 acres of land conveyed to James O. Harne by Joseph Stottlemeyer, described in Bill of Complaint as Exhibit N.

E. 21 3/4 acres of land conveyed to James O. Harne by Samuel P. Bussard, described in Bill of Complaint as Exhibit 3.

F. 45 1/8 acres of land conveyed to James O. Harne by Benjamin Shuff. (Two tracts). described in Bill of Complaint as Exhibits "L" and "M".

G. 3 3/4 acres of land conveyed to James O. Harne by Hanson Draper and wife, described in Bill of Complaint as Exhibit "Q".

H. 39 acres of land conveyed to James O. Harne by John Kelbaugh, described in Bill of Complaint as Exhibit "P".

I. 26 acres of land conveyed to James O. Harne by Samuel P. Bussard and wife, described in Bill of Complaint as Exhibit 2.

All of the above tracts of land are mentioned in the Bill of Complaint.

4. That your Respondent consents to the sale of the aforementioned premises included in her mortgage by a Trustee to be named by your Honorable Court, reserving a lien upon the proceeds of sale in like manner as upon the real estate.

And as in duty bound, etc.  
(Filed January 29, 1929)

Emma C. Groff