

wer the Bill and Complaint of Doctor Ulysses G. Bourne, et al For Sale of Real Estate of Amanda E. Probee, Deceased, (Creditors Bill) against you and others, in said Court exhibited, and so forth.

Hereof, fail you not, as you will answer the contrary at your peril.



Witness the Honorable Hammond Urner, Chief Judge of said Court, the 5th day of January A. D. 1931.

Issued the 8th day of January A. D. 1931.

Eli G. Naugh, Clerk

To the Sheriff of Frederick County.

H. Dorsey Etchison, Solicitor
Solicitor

The defendant is required to file his answer or other defense in the Clerk's office within fifteen days after the return day mentioned above, but the personal attendance of the defendant at Court on the return day is not required.

Summoned. Philip A. Probee and a copy of subpoena left with him.

Charles W. Crum, Sheriff

(Filed January 9, 1931)

Joint and Several Answer of Philip A. Probee et al.

DR. ULYSSES G. BOURNE AND THOMAS P. RICE)	No. 12176 Equity
)	IN THE CIRCUIT COURT FOR
vs.)	FREDERICK COUNTY,
PHILIP A. PROBEE AND ANNIE S. PROBEE)	IN EQUITY.

TO THE HONORABLE, JUDGES OF SAID COURT:

The joint and several answer of Philip A. Probee and Annie S. Probee, the Defendants, to the Bill of Complaint of Dr. Ulysses G. Bourne, and Thomas P. Rice, in your Honorable Court exhibited against them.

THESE RESPONDENTS, SAY:-

FIRST: That they admit the allegations contained in the First, Second and Third paragraphs of said Bill of Complaint, relating to the death of Amanda E. Probee, and to her Last Will and Testament, and the provisions thereof, involving the disposition of her property and estate.

SECOND: That they admit the allegations contained in the Fourth Paragraph of said Bill of Complaint, as to the residence of these Defendants.

THIRD: That they also admit the allegations contained in the Fifth paragraph of said Bill of Complaint, as to the description therein of the real estate of which the said Annie S. Probee died seized and possessed.

FOURTH: That they admit the allegations contained in the Sixth paragraphs of the Bill of Complaint, as to the indebtedness of the said Amanda E. Probee to the Plaintiffs, as therein specified.

FIFTH: That they also admit all the allegations contained in the Seventh paragraph of said Bill of Complaint, referring to the absence of any personal property "out of which the claims of" the plaintiffs can be paid, and as to the necessity for a sale of the real estate, therein mentioned.

SIXTH: That having admitted all the allegations of said Bill of Complaint, they also consent to the passage of a decree for the sale of the real estate, and for the appointment of the plaintiff's attorney as the trustee to make said sale.

and as in duty, etc.

Leo Weinberg

(Filed August 14, 1931)

ATTORNEY FOR DEFENDANTS