

11. That, answering the thirteenth paragraph of the Bill of Complaint, these Respondents aver that all papers of the congregation written or executed during the first two and one-half years of organization are in the hands of J. Vernon Boone, and there is no reason why they should not be filed as Exhibits with the Bill of Complaint.

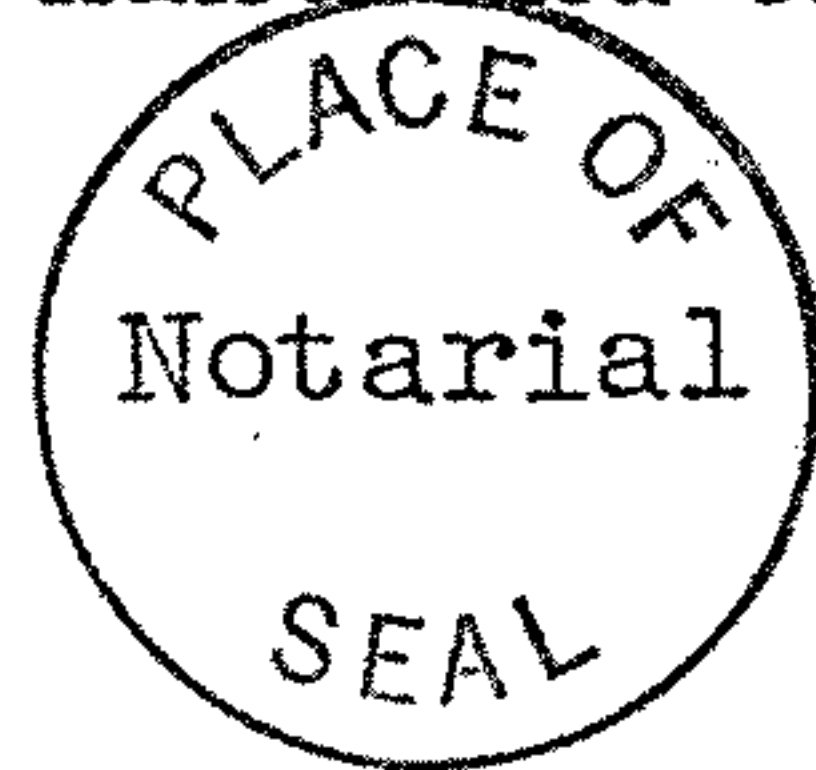
WHEREFORE, these Respondents pray that the Bill of Complaint be dismissed with costs, and while this proceeding is pending, that the Complainants be restrained from using the Bethel Tabernacle and the equipment therein.

Leslie N. Coblentz
Solicitor for Defendants

STATE OF MARYLAND, FREDERICK COUNTY, TO-WIT:

I hereby certify that on this 7th day of March, 1938, before me, the subscriber, a Notary Public of the State of Maryland, in and for Frederick County, personally appeared Evelyn D. Becker, Elizabeth A. Beylor, William Elmer Sittig and William Layman and made oath in due form of law that the matters and facts stated in the foregoing Answer are true as therein set forth to the best of their knowledge, information and belief.

Witness my hand and Notarial Seal the date above written.



J. Vernon Coblentz
Notary Public

Filed March 7, 1938.

AMENDMENT TO BILL OF COMPLAINT

BETHEL TABERNACLE, AN UNINCORPORATED RELIGIOUS ASSOCIATION, ET AL.	"	NO. 13,686 EQUITY
	"	IN THE CIRCUIT COURT FOR
VS	"	FREDERICK COUNTY, IN EQUITY.
EVELYN D. BECKER, ET AL.	"	

TO THE HONORABLE JUDGES OF SAID COURT:

As an amendment to the Bill of Complaint filed in the above entitled cause your Orators do hereby file the within paragraph to be entitled One A and to be inserted between Paragraph marked First and the paragraph marked Second in the aforesaid Bill of Complaint:

That your Orators, J. Vernon Boone, Silas T. Rickards, Marshall Bell and Charles Masser and Katherine Klipp were charter members of Bethel Tabernacle, an Unincorporated Religious Association, at the time of its organization and have still retained their membership in said congregation as originally formed and that Marshall Bell, J. Vernon Boone and Silas Rickards, who were elected Trustees in July, 1930 by the congregation of Bethel Tabernacle have never resigned from said office, nor been removed by said congregation, nor have they declined to continue their duties as Trustees.

Robert E. Clapp Jr.

Alton Y. Bennett
Attorneys for Plaintiffs

Filed March 29, 1938.

Answer of Defendants To Amendment
to Bill of Complaint.

Bethel Tabernacle, an unincorporated religious association, et al.	"	No. 13,686 Equity
	"	In the Circuit Court
vs.	"	For Frederick County
Evelyn D. Becker, et al.	"	In Equity.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Answer of the Defendants to the Amendment to the Bill of Complaint, in the form of paragraph One A, responds unto your Honorable Court:

- (1) That these Defendants admit that J. Vernon Boone, Silas T. Rickerds, Marshall