

ANSWER of Alban M. Wood,
Trustee.

Helen Norris Flagg and Joseph D. Flagg, her husband,	"	No. 13,883 Equity
	"	In the Circuit Court for
vs.	"	Frederick County,
Josie W. Simpson and F. Loraine Simpson, her husband, et al.	"	In Equity.
	"	

To the Jonorable the Judges of said Court:

The Answer of Alban M. Wood, one of the Trustee in the above cause, to show cause Order filed July 19, 1939, respectfully shows:

First: That he admits the allegations of the first and second paragraphs of said Petition.

Second: Answering the third paragraph of said Petition - that there were certain tentative or prospective arrangements made for meetings for the purpose of advertising said farm, which for one reason or another never were held and possibly, perhaps, because of the idea of this Respondent that said sale being held at a date closer to the time when farm tenancies change would be more advantageous to all the parties concerned in said cause, which, when communicated to the co-Trustee, was never disputed and his insistence was based upon no reason except that his clients desired an immediate sale.

Third: Answering the fourth paragraph of said Petition, this Respondent says that there was one definite date fixed for a conference on the advertisement, but between the arrangement of the date and the date your Respondent was for the first time informed, to the best of his recollection, that one of the Defendants, to-wit: F. Loraine Simpson, had caused the barnyard fence to be removed, which, in his opinion, would greatly depreciate the selling price of the farm.

Fourth: That your Respondent filed in this cause a Petition requiring the Defendant, F. Loraine Simpson, to show cause why he should not replace said fence, and your Respondent respectfully submits that this matter should be adjudicated by the Court so as to relieve not only your Respondent but the petitioning Trustee of any liability or responsibility for a greatly reduced selling price of this farm.

And having fully answered, your Respondent asks that the Petition be dismissed, etc.

Alban M. Wood
Trustee.

Filed July 26, 1939.

Petition to be made party
Defendant, affidavit, Order
of Court and admission of
Service by Plaintiff.

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To the Honorable, the Judges of said Court:

The Petition of S. McKinstry Norris respectfully represents:

1. That in the above-entitled cause the Court duly appointed Trustees to sell the real estate described in said proceedings and the same has been advertised for sale on September 19, 1939.
2. That your Petitioner had a one-eighth interest in said real estate described in said proceedings until he was prevailed upon to execute a deed to a certain F. Loraine