

State of Maryland, Frederick County, to wit:-

I hereby certify that the foregoing is a true copy of the original Deed from Charles W. Hallar to Sarah B. Hallar, et.al. as recorded in Liber J. L. J. No. 3, folio 301 &c., one of the land records for Frederick County, Maryland.

Place of
Court Seal.

In Testimony Whereof, I hereunto subscribe my name and affix the Seal of the Circuit Court for Frederick, at Frederick, Maryland, this 25th day of May, A. D. 1942.

Ellis C. Wachter
Clerk of the Circuit Court for Frederick County, Maryland.

Filed with me as evidence in the above-entitled cause this 21st day of April, 1942.

Alfred R. Jones (SEAL)
Examiner

Filed May 25, 1942

ANSWER OF LOUISE RHODERICK AND SAMUEL RHODERICK

Jessie M. Hallar, unmarried, et.al.	"	No. 14,667 Equity
	"	In the Circuit Court for Frederick County,
Vs.	"	Sitting as a Court of Equity.
Charles W. Hallar, et.al.	"	

To the Honorable Judges of said Court :

The Answer of Louise Hallar Rhoderick and Samuel Rhoderick, her husband, to the Bill of Complaint filed against them in the above entitled cause respectfully shows unto your Honorable Court:

FIRST: That they admit the matters and things contained in the 1st, 2nd, 3rd, 4th, 5th and 6th paragraph of said Bill of Complaint.

SECOND: Answering 7th paragraph of said Bill of Complaint your Respondents admit the allegations contained in sub-paragraphs a. b. and c. In answering sub-paragraph d. your Respondents say that they have no legal grounds upon which they can object to Fred Anders and Mame Anders being made parties Defendants in this cause however your Respondents say that the said Fred Anders and Mame Anders should not have been made either party Defendants or Party Plaintiffs in this cause, in that they are excluded from receiving any benefits derived from the sale of the real estate, as described in Exhibit No. 1 filed in this cause, due to the fact that in the deed made by Charles W. Hallar, it was set forth; "I grant, bargain, sell and assign said real estate----- to all of my children then living and the child or children of any deceased child, per stirpes, including said grantees or any of them, if living and married or having voluntarily abandoned said real estate as a home," and in that the said Fred Anders and Mame Anders are not the child or children of any deceased of a child of the said Charles W. Hallar, but are grandchildren of Alice Hallar Anders a daughter of the said Charles W. Hallar and are therefore not entitled to receive any benefit from proceeds derived from the partition of the real estate described in Exhibit No. 1 in this cause; and although your Respondents can not raise the objection of misjoinder of the said Fred Anders and Mame Anders as Defendants in this cause, they desire to raise the objection to the said parties receiving a share or shares of the proceeds that may be obtained from the sale of the aforesaid real estate in that it would vitally effect their interest.

THIRD: That your Respondents consent that a decree be passed by your Honorable Court for the sale of the said real estate and that a Trustee or Trustees be appointed to make said sale that the said Respondents further consent that the proceeds derived from said sale be divided between the parties in this cause according to their respective rights and interests therein.