

ANSWER

Mary A Rice by Samuel
her husband and next
friend

Vs

Frances E Rice et al

No 6923 Equity

In the Circuit

Court for Freder-

rick County in

Equity .

To the Honorable, the Judges of the Circuit Court for Frederick
County in Equity .

The answer of Caleb L Wachter to the Petition filed against him in
this cause on the 15th day of October 1898 and for cause why the or-
der prayed for in said Petition should not be passed respectfully
shows ;

1st. That he is wholly unable to comply with the terms of sale
by reason of a want of means ; that he has tried to secure the mo-
ney and security needed to comply and has utterly failed in either
procuring the money to make the cash payment or to get securities
for the deferred payments .

2nd. Because said purchase was induced by the representations made
to Respondent by the Trustees and especially by trustee Waters that
he , Waters , would aid Respondent in procuring all the money he
needed , that he Waters , would see that he had no trouble in get-
ting the money and other and similiar forms of persuasion and in-
ducement ; that Respondent trusted to these persuasions and relying
on them and on the aid to be furnished signed the memorandum of ~~sale~~
sale , knowing his own inability to buy and trusting to the represe-
ntations of said Trustees and especially of said Waters ; and that
said Waters has since said sale utterly refused to aid or assist
Respondent in any way that could make the purchase possible by this
Respondent .

3rd . That this Respondent is advised and believes that this Hono-