

## REPLICATION

Mary A. Rice, by Samuel Rice  
her husband and next friend,  
vs.  
Frances E. Rice et al.

No. 6923 Equity  
In the Circuit Court for  
Frederick County as a  
Court of Equity.

To the Honorable the Judges of said Court;

The replication of Charles C. Waters and Charles P. Levy, Trustees in this cause, to the answer of Caleb L. Wachter filed in this cause on the fourth day of November A.D. 1898, respectfully shows;

1. They deny that said Caleb L. Wachter is wholly unable to comply with the terms of sale, and deny that he has tried to secure the money and security needed to comply. And allege that at the time said Wachter purchased the real estate sold under the proceedings in this cause, said Wachter was possessed of unincumbered real estate worth about nine hundred dollars besides unincumbered personal property, and that shortly after said Wachter purchased said real estate of your petitioners he with intent to defraud, hinder and delay your petitioners from recovering from him the purchase money for said real estate so sold to him, and to baffle and defeat said sale, conveyed said real estate so owned by him at the time of his said purchase, for a grossly inadequate price, namely \$500.00, to a grantee who was aware of Wachter's agreement to purchase said real estate from your petitioners, and who was aware that said Wachter had not complied therefor and was endeavoring to avoid his liability as said purchaser.

2. That Charles P. Levy, one of the trustees, denies the allegations of the second paragraph of said Wachter's answer in so far as they apply to him, and says that the al-