

ANSWER OF EVERETT STULL ADMINISTRATOR OF BENTON STULL, DECEASED

Marion Webster Stull	"	No. 14,595 Equity.
	"	
vs.	"	In the Circuit Court for
	"	
Everett Stull and	"	Frederick County, Maryland.
	"	
Grace Stull, his wife,	"	In Equity.
	"	
et al.	"	

To the Honorable the Judges of said Court:

Everett Stull, Administrator of the estate of Benton Stull, deceased, answering the Bill of Complaint filed in this cause, says:

1- That he admits that Benton Stull, late of Frederick County, Maryland, deceased, died, intestate, seized and possessed of certain real estate in Frederick County, Maryland.

2- That he admits that the Plaintiff and the Defendants named in said cause are the next of kin and only heirs at law of the said Benton Stull, deceased.

3- Further answering the said Bill of Complaint, this Defendant says that he is advised and so avers that Benton Stull in his lifetime sold the farm of 110 acres to Guy Stull, but that no deed was executed for the same, because the said Benton Stull was unable at that time to give a clear title to said real estate, and that it was mutually agreed by and between the parties that the contract should continue until the said Benton Stull should be able to clear the title to said farm; and he further alleges that the said Benton Stull died before he was able to clear the title to said farm.

4- That as Administrator he would be entitled to receive the purchase money for said farm, if the Court should find that there was a bona fide sale in the lifetime of the late Benton Stull.

And having fully answered said Bill of Complaint he prays to be hence dismissed with his reasonable costs.

Filed July 27, 1942

Holden A. Dalton
Solicitor for Respondent.