

22 MAR 1966

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

BERNICE P. WILLIAMS, et. als.)
Complainants)
VS.) No. 20327
MAGGIE M. PROCTOR, et. als.) IN EQUITY.
Defendants)
)

ANSWER

TO THE HONORABLE JUDGES OF SAID COURT:

The Answer of Teresa Summers, Richard O. Johnson, Jr., Joseph S. Johnson, Josephine Jefferson, (Evelyn Wright), five (5) of the defendants respectfully answers and says:

(1) Defendants admit the allegations of Paragraph 1 of said Bill of Complaint.

(2) Defendants admit the allegations of Paragraph 2 of said Bill of Complaint.

(3) Defendants admit the allegations of Paragraph 3 of said Bill of Complaint.

(4) Defendants neither admit nor deny the allegations of Paragraph 4 of said Bill of Complaint but demand strict proof thereof.

(5) Defendants neither admit nor deny the allegations of Paragraph 5 of said Bill of Complaint but demand strict proof thereof.

6. Defendants deny the allegations of Paragraph 6 of said Bill of Complaint.

WHEREFORE the defendants having answered all and singular the allegations contained in the Bill of Complaint they pray that said Bill of Complaint be dismissed and that they be awarded their cost expended herein.

Teresa Summers (SEAL)
TERESSA SUMMERS

Richard O. Johnson, Jr. (SEAL)
RICHARD O. JOHNSON, JR.

Joseph S. Johnson (SEAL)
JOSEPH S. JOHNSON