Whereupon Citations were Issued Agreeable to the Libellants Prayer Directed
unto the 2d Tuesday of Jan.y 1774 Came the Shff of Talbot County to whom the said
the Defendants in this Cause being called upon Appear and file their Answer to the

Oldham Deceased and Nicholas Martin two of the Respondents and also of Hannah M
which said Hannah Sarah and Margaret are Children of the said Edward Oldham
Oldham Duly appointed their Guardian in this Part to the Libel of Joshua Clark
The said Respondents now and at all times saving to themselves all Manner of Ad
of the said Libel for Answer thereto or to such part thereof as they are Advised is Material
Departed this Life in October Last Seized and Possessed of a Considerable Real and P
that a Paper Purporting to be the Testament and Last Will of the said Edward Oldham
other than the said Nicholas Martin Say that the said Edward Oldham now about
make Sign Seal Publish and Declare the same Papers and for his Last Will
Doing thereof and the said Ann Oldham Saith that the same was Done in the Morning
her Apprehension of Sound and Perfect Mind and Memory in no wise Disordered in his
Deponent at the time of the Date of the said Paper was Acquainted with the
his said Wife) and that he was Suspected not Did ever hear anyone Else therein
Several Years after his Making the Said Wife) That after the said Nicholas Martin
Clark having before told him the Same Respondent in what Manner he had Disposed
Clark to read it and the said Clark Did Accordingly Read it and that at other times
Proposed to Convey that Part of his Estate Devised by the said Will to this Respondent
Oldham also Answering Saith that the same Manner of the Execution of the said
one of the Libellants a Negro Boy Called Sam and to his Daughter the said Eliz.a
Been held and Possessed under those Gifts of them and those Respondents for their
or in any Sort Disordered in his Intellects at the time of his Making the Said Will
Property at that time that he afterwards did not ~~Truly~~ only Actually Dispose of Several
said Will a Justice of the Peace for Talbot County he Continued and Acted as such for
these Defendants to make Answer unto and not herein here by Sufficiently Answered
Prove and so forth Wherefore these Respondents pray that the said Will may be Adjudged
Oldham and that these Defendants may be hence Dismissed with their Costs in the

20th Jan.y 1774 Then Came before me the Subscriber one of the Lord Proprietarys Justices of the Peace for Ann Arundel County the aforesaid Ann Oldham and Nicholas Martin and Severally made Oath on the Holy Evangelists of Almighty God that the facts set forth in the foregoing Answer to be true to the Knowledge of these Respondents Respectively as true to the Knowledge of these Respondents Respectively and that those which are not so to be true in the Belief of the said Respondents Respectively they do Respectively Believe to be true and that those which are Denied to be true to the Knowledge and in Belief of these Respondents or either of them are not true to the Knowledge or in the Belief of these Respondents Respectively

Sworn before David Herr

Which being Read and Heard the Libellant Prays that a Commission be Issued to Examine Evidence in this Cause which was Granted them Directed to Jno Bracco Gent Deputy Commissary of Talbot County and this Cause was Continued to the Next Court

to the Shreiff of Talbot County Returnable the 2d Tuesday of Jan.y next at which said Day to
ept were Directed and made Return thereof to the Court here thus Endorsed Filed Whereupon
Libel also in the Words following to wit

The Answer of Ann Oldham Widow of Edw
in Wife of the said Nicholas Martin Sarah Oldham Margaret Oldham and Mary Oldham
Infants under the Age of Twenty one Years and as the other Respondents by the aforesd Ann
and Ann his Wife Wm Hopper and Eliz. his Wife) and Edward Mary and Charles Markland
vantage and Benefit of Exception to the Many untruths uncertainties and Imperfections
for them to Answer unto they Answering Say they do Admit that the said Edward Oldham
onal Estate leaving such Relations as in the said Libel is set forth and they further Admit
Hath been Since Exhibited into and Lodged in the Prerogative Court and the said Respondents
ten Years ago and as they Believe at the same time that the said Paper bears Date Did
Testament in due form of Law that the said Respondent Ann was Present at the Execution and
and that the said Edward Oldham was at the time thereof to the Best of her Judgment and in
ences of Understanding the said Respondent Nicholas Martin for himself Saith that he this
said Edward Oldham and with his Family and Continued to be so till his Marriage with
any Suspicion that the said Edward Oldham was Lunatick or Disordered in his Senses till
Marriage the said Edward Oldham shewed him the said Will) before the Libellant Joshua
of his Estate and Desired this Respondent to read it but this Respondent Requested the said Joshua
both before and after the time of reading the said Will the said Edward Oldham Offered and
Wife Reserving his own life therein but this Respondent Declined the said Offer the said Ann
Will and a very little time thereafter the said Edward Oldham Gave to his Daughter Ann Clark
then Eliz.a Oldham Another Negro Boy Called Sam which said Negroes are and always has
wering say that the said Edward Oldham was not to their Knowledge or in their Belief Insane
they further Say that he was so far from being incapable of making any Disposition of his
arts of his Property and Convey some Part of his real Estate but being at the time of Making his
Several Years thereafter without that any Matter or thing in the said Libel Contained Material for
nts Confessed or Avoided is Necessary all which Matters these Defendants are Ready to Verify and
Proof that the same may be Adjudged the true Last Will and Testament of the said Edward
Part most Wrongfully Sustained

Wm Johnson Junr Atty for Defdts