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whatever quantity they may - That Darius Hodson by his deed bearing date as aforesaid on the sixteenth day of February in the year eighteen hundred and fifteen before referred to as exhibit A. did convey to his mother Catharine Shippy in fee simple all his right and title to the said lands of James Hodson called "Fork Neck," and "Addition to Fork Neck" and Maidens Lot," an undivided fourth part of which the said Darius Hodson was then entitled to as is stated in the said Bill -

That the said Catharine Redhead by her deed before referred to and marked Exhibit B. did convey to her sister the said Ann Shippy in fee simple all of the said Catharine Redhead's right and title to the said lands called "Fork Neck" "Addition to Fork Neck and Maidens Lot" which said right at the time of the execution of the said deed embraced three undivided fourth parts of said lands - your defendant denies that under the deed of the eleventh day of December in the year eighteen hundred and twenty four before referred to in this answer as exhibit B. and relied upon in the said Bill the said Catharine Redhead did convey to her sister the said Ann Shippy this defendant her simple undivided moiety of her mothers undivided fourth part, and your defendant relies upon the said deed as vesting in this defendant by virtue of the legal and equitable operations of the said deed all the right and title in and to the said lands mentioned in the said Bill of which the said Catharine Redhead was at that time seized and possessed which amounted to three undivided fourth parts thereof - Your defendant maintains that this is the legal and equitable construction to be put upon the said deed, and submits the same to the decision of your Honor - As further evidence of the intention of the contracting parties to the said deed marked Exhibit B. if additional testimony were required as to the propriety of the construction now urged and relied upon by this defendant she refers to the instrument of writing hereunto filed marked Exhibit C. and prayed to be taken as part of this answer - By virtue of her right anterior to the said deed marked Exhibit B. as stated in the said bill and from the operation of the said deed from her sister Catharine Redhead this defendant now claims the entire right to the property mentioned in the said Bill to wit. "Fork Neck," and "Addition to Fork Neck" and "Maidens Lot," in fee simple and this defendant denies that the complainants in this bill are entitled to any undivided or other right whatever in and to the said real estate - your defendant admits that on or about the sixteenth day of March in the year eighteen hundred and thirty five all the interest of Catharine Redhead formerly Catharine Hodson daughter of James Hodson as aforesaid was sold by Reuben Tall sheriff of Dorchester County at the suit of James Bryan use of John Williams and that a certain John Williams became the purchaser at that sale and that John Williams conveyed all his right under and by virtue of said sale to a certain John Robinson and the latter conveyed the same in fee to Catharine Higgins one of the complainants - That the judgment was obtained in October 1828 - Your defendant denies that any valid right either in law or equity was vested in the said John Williams under and by virtue of the said sheriffs sale, or that any right whatever has been conveyed by said Williams to the said John Robinson or from the said John Robinson to one of the complainants to wit, Catharine Higgins - your defendant answers and states that by the deed of 1824 from Catharine Redhead to this defendant marked Exhibit B. the said Catharine Redhead did convey all her interest to this defendant who

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retains all her interest to this day and that Catharine Redhead at the time of the said sheriffs sale did not hold any right whatever in and to the said lands mentioned in the said bill - This defendant utterly denies that the complainants are entitled to three undivided fourth parts but maintains she is entitled solely to the said property in fee simple - This defendant admits that the said property cannot be divided without loss to her, and she objects to a sale of the said property under a decree of your Honor for the purpose of division because she claims the entire property as exclusively her own in fee simple and she prays that the said bill may be dismissed with reasonable costs to this defendant &c.

James A. Stewart Sol. for Defendant -

I hereby agree that the Chancellor shall receive the foregoing answer without oath -

Henry Paige, Sol. for Compl.ts

Exhibit A

Catharine Shippey
From
Darius Hodson -

Be it remembered that the following deed was recorded on the 16th day of February 1815, to wit -

This Indenture, made this sixteenth day of February eighteen hundred and fifteen between Darius Hodson of Dorchester County and State of Maryland of the one part and Catharine Shippey of the County and State aforesaid of the other part witnesseth that the said Darius Hodson for and in consideration of the sum of two thousand dollars current money to him in hand paid by the said Catharine Shippey before the sealing and delivery of these presents the receipt whereof he the said Darius Hodson doth hereby acknowledge and from every part and parcel thereof doth hereby acquit exonerate and discharge the said Catharine Shippey her heirs executors and administrators he the said Darius Hodson hath granted bargained sold aliened enfeoffed and confirmed and by these presents doth grant bargain sell alien enfeoff and confirm unto the said Catharine Shippey her heirs and assigns all his right title and interest to the following tracts of land lying in the County aforesaid and on Transquakin River to wit. "Fork Neck" and also all and every other tract or part of tracts or parcels Land lying in said County that he has any right or title in either in Law or equity let the same be called by whatever name or names they may or what ever quantity they may contain together with all and singular the buildings improvements privileges hereditaments and appurtenances whatsoever thereunto belonging or in anywise appertaining and the reversions and remainders rents issues and profits thereof and all the estate right title and interest whatsoever of him the said Darius Hodson both at law and in equity of in to and out of the said several Tracts or parts of tracts or parcels of Land and premises hereby bargained and sold or meant mentioned or intended hereby so to be and every or any part and parcel thereof; To Have and to Hold the said parcels of Land so aforesaid described called by whatsoever name or names the same may be called together with the buildings and appurtenances and all and singular other the premises hereby bargained and sold or meant mentioned or intended hereby so to be and every part and parcel thereof with their and every of their appurtenances unto the said Catharine Shippey her heirs and assigns forever and to and for no other use intent or purpose whatsoever - In Testimony whereof the said Darius Hodson hath hereto set his hand and seal the day and year first above written -

Signed sealed and delivered in the pre. sence of - Rich.d Pattison Henry K. Elbert -

Darius Hodson. (Seal)

On the back of the aforegoing deed