To the Sheriff of Frederick County.

Which said writ of injunction was delivered to the Sheriff of Frederick County, and was afterwards returned by him endorsed:

Sheriffs Return

"September 23d 1880" "Served" Joseph S. B. Harlacock, Sheriff.

And afterwards, to wit; on the 18th day of October, in the year eighteen hundred and eighty, the said Eldred W. Mobberly by William T. Mandby Jr. and Charles W. Ross, Esquires his Solicitors, filed in Court here, the following answer, to wit:

Answer of Defendant.

The Answer of Eldred W. Mobberly of Frederick County, Maryland to the Bill of Complaint of John Cook Mobberly filed in the Circuit Court for Frederick County sitting as a Court of Equity against him.

This respondent for answer to said Bill of Complaint answers and says, that he admits that on the 27th day of February 1880 he instituted an action of ejectment in the Circuit Court for Frederick County to recover possession of a certain part or parcel of land lying and being in Frederick County Maryland and known as part of a tract of land called "Lapland" and part of a tract called "Locust Thicket", and which is particularly described in the declaration filed in said ejectment suit and that Exhibit A." filed with said Bill is a true certified copy of such declaration, and that exhibits B & C. are also true certified copies of the proceedings in said suit.

And this respondent further answering says, that he denies that he being desirous of procuring a home for the said complainant, and to make provision for his support, maintenance and settlement in life, agreed to give the said complainant the aforesaid described tract or parcel of land or that in pursuance of any such supposed agreement, or in

execution of such gift, or as referring thereto and resulting therefrom, placed the said Complainant in possession thereof, as absolute owner in fee simple, And your respondent utterly denies that he ever made such gift, or as resulting from any agreement to make such gift place the Complainant in possession of said Tract of land.

And this respondent utterly denies that he ever declared to the said Complainant or to other persons that he had given said tract or parcel of land to said Complainant and that he was the sole and proper owner thereof and that he could do therewith whatsoever he saw fit, And this respondent also denies that the complainant laid out and expended large sums of money in permanent improvements on the said farm, with the full knowledge and concurrence of this respondent.

This respondent further answering said Bill, says that some years ago he purchased the farm mentioned in these proceedings from a certain George Smith Trustee, and took possession of and cultivated the same that when the Complainant grew up, he was a wild and very intemperate young man, and with the hope that he might reform and lead a different life, your respondent stocked the said farm and placed the said Complainant in possession of the same, and gave him the entire proceeds of the same for his support and maintenance and the said Complainant continued from time to time on said farm, sometimes living on said farm then at other times engaging in other occupations up and until the year 1865, when the Complainant sold off the farming stock, and entirely gave up farming.

Your respondent further states that from that time he took possession of said farm and rented the same and