afterwards at the same Term came the Defendants William Jones Washington Jones and Edward Jones by their counsel aforesaid and filed in the said cause their answer in the words following to wit.

To the Honorable Theodorick Bland Chancellor of Maryland.

The joint and separate answer of William Jones Washington Jones and Edward Jones to the bill of peirson exhibited against them in the Court of Chancery in the case of William Plater administrator of John R Plater vs Edward Jones and Sarah his wife. These defendants now and at all times hereafter saving and reserving to themselves all and all manner of benefit and advantage of the many misstatements uncertainties and untruths in the original bill and bill of peirson contained for answer nevertheless to so much of said bills as they are advised that it is necessary or material for them to answer answering say that they admit it to be true that John Darnall mentioned in the original bill did purchase from the said John R Plater the tract of land called Elkton Head Manor, and that complainants Exhibit A is a counterpart of the agreement made between the said John Darnall and the said John R Plater but for greater certainty they herewith produce the contract marked Exhibit I. But these defendants deny that the said John Darnall owed the said John R Plater as much more at the time of his the said Darnalls death as is stated in the complainants Exhibit D. and your respondents aver that a resurvey of the said land was made by and with the consent and approbation of the said John R. Plater on or about the first of April 1839 by which it appears that the said tract of land contains nine hundred and forty three acres of land instead of nine hundred and ninety eight and a half acres of land as is stated in said Exhibit A. and these defendants herewith file a plot of said survey marked defendants Exhibit E. and these respondents are advised that they are entitled to a deduction from the amount claimed by the complainant on the aforesaid contract for the value of fifty five and a half acres at nine dollars per acre and they pray that such deduction may be made. These defendants admit the death of John Darnall and that his death occurred about the time mentioned in the original bill. They also admit that complainants Exhibit D is a true copy of the said John Darnall's will. They admit that Edward Jones and Benjamin Sellers the executors named in the will of the said John Darnall took upon themselves the execution of the said will. That Benjamin Sellers died about the time mentioned in the bill and Edward Jones about the time mentioned in the bill of peirson. They also admit that Sarah Jones is dead and that she died about the time mentioned in the bill of peirson. They admit that the heirs at law of the said Edward Jones and Sarah Jones are correctly named in the bill of peirson. These defendants further answering say that Susan Jones the daughter of the said Edward Jones and Sarah Jones was married to one John Hoopper about the year eighteen hundred and thirty three and they are advised that said John Hoopper who resides in Calvert County is a necessary party to this suit. These defendants admit that said John R Plater died about the time states in the original bill and that his heirs at law are correctly

named in the bill. They also admit that the complainant is the administrator of the goods and chattels &c of the said John R Plater. These defendants further answering say that the paper herewith exhibited marked Exhibit F, is a true statement of the balance now due by the administrator de bonis non with the will annexed of the said John Darnall to the complainant administrator of said John R Plater as they will be prepared to shew should the same be desired by the complainant. and these defendants aver that there are personal assets in the hands of the defendant Washington Jones administrator of the said John Darnall sufficient to pay the said balance of two hundred and eighty one dollars and thirty six cents, and they claim that upon payment of the aforesaid balance the said complainant and the other heirs at law of the said John R Plater may be compelled to convey all the aforesaid land contracted to be sold to the said John Darnall to the defendants Washington and Edward Jones the said John Hoopper and Susan his wife Charles Jones and Anthony Tall. These defendants admit there are not assets in the hands of the said Washington Jones administrator of the said John Darnall to pay any larger sum than the aforesaid balance. And these defendants further answering say that the said Edward Jones in his lifetime purchased from the said Charles Darnall all his interest in the land devised to him by the said John Darnall as will appear by a copy of the said Charles Darnalls deed to said Edward Jones herewith filed marked Exhibit G. They further state that the defendants Philip C Watson and Elizabeth Watson conveyed the land devised to Elizabeth Watson by the said John Darnall to one Leonard Watson as will appear by a copy of their deed herewith filed marked Exhibit H, and that said Edward Jones purchased the interest of said Leonard Watson in said land at a sheriffs sale as will appear by a copy of the sheriffs deed herewith filed marked Exhibit I. These respondents deny that either the said Charles Darnall or the said Philip C Watson and Elizabeth Watson his wife has any interest in said lands. and these respondents further state that your respondent Edward Jones and one Anthony Tall have purchased the interest of the defendant William Jones in said lands. These defendants having fully answered pray hence to be dismissed with their costs &c.

Somerville Pinkney for Defts

Calvert County to wit, on this 1st day of August 1838 personally appear Washington Jones and Edward Jones before me subscriber a Justice of the peace in and for said County and make oath that the facts and statements contained and set forth in the above answer are true to the best of their knowledge information and belief.

Sworn before — Basil S Dixon

Prince Georges County to wit, on this 31st day of August 1838 personally appears William Jones before me the subscriber a justice of the peace in and for said County and made oath that the facts and statements contained and set forth in the above answer are true to the best of his knowledge information and belief.

Sworn before — Hon: C Scott