his answer to the said Bill in the words following to wit.

Alexander C Bullit, } In Chancery.
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William W Handy. } The answer of Alexander C Bullit defendant to the Bill of Complaint of William W Handy complainant the said defendant saving and reserving to himself now and at all times hereafter all & all manner of benefit and advantage of exception to the manifold errors & uncertainties in the complainants said Bill of Complaint contained for answer thereto or unto so much thereof as he hath been advised is material for him to make answer unto answereth and saith that he admits it to be true that on the twenty eighth day of May in the year 1834 the said complainant had in himself a fee simple title in and to the lots of ground and premises mentioned in his said Bill of complainant situated on the west side of Holliday Street in the city of Baltimore and nearly opposite to the City Hall but this Defendant denies that the said Complainant had the sole say in and possession of the said lots of ground and premises and this defendant further answering saith that he hath understood and believes and charges it to be true that the said lots of ground and premises had been purchased by the said complainant in conjunction with Dr Horatio Gates Jamieson Dr Samuel Duman Dr Henry Miller & Dr Samuel R Jennings and others whose names are unknown to this defendant and that a building had been erected thereon by the complainant and his associates as and for a medical school and was then & for the space of about one year thereafter used occupied and enjoyed by the said complainant and his associates as and for a medical school — and this Defendant further answering saith that he admits it to be true that on or about the 28th day of May in the year eighteen hundred and thirty four he did enter into an agreement with the said complainant acting for himself and his said associates for the purchase of the said Lots of ground and premises at and for the sum of six thousand dollars and that he did receive from the said Complainant a bond of conveyance for his said purchase conditioned as hath been set forth in the complainants said Bill and which is herewith produced and filed marked Defendants exhibit A and which he prays may be taken and considered as a part of this his answer to the complainants said Bill of complaint but this defendant expressly denies that possession of the said lots of ground and premises was delivered to him at the time of his said purchase, and he further saith that the said complainant and his associates continued for the space of about one year after the said sale to use occupy and enjoy the said premises as before and that it was understood and agreed between the said complainant and this defendant that he should be allowed a reasonable compensation by way of rent for the said premises for the time that they should be so occupied, and he charges that he is entitled to at least four hundred dollars per annum for the use and occupation the said premises for the time that they were so occupied and he further saith that at the time that he made the said purchase the taxes upon the said premises for the year 1833 amounting to the

sum of twenty one dollars and thirty five cents were in arrear and unpaid, and that he hath paid the same, and that he hath also paid the taxes for the year 1834 and that he hath been advised that he is entitled to be allowed for all the taxes for the year 1833 and a rateable proportion for the year 1834 and he herewith exhibits and files the Bills and receipts for the said taxes, marked Defendants Exhibit B & C, and prays that the same may be taken and considered as a part of this his answer to the complainants said Bill of complaint, and this defendant further answering saith that he ~~hath~~ paid the said complainant on the day of the date of the said bond of conveyance the sum of three thousand dollars as will appear by his receipt endorsed thereon that he also paid to Dr Samuel Duman on account of the said purchase two hundred and fifty dollars and also the further sum of nine hundred and fifty dollars as will appear by his receipts on the said bond of conveyance without date and the date whereof he does not remember that on the 19th day of May 1835 he paid to the complainant on the same account the further sum of nine hundred and fifty dollars and the further sum of four hundred dollars on the 1st day of January 1836 as will appear by his receipts endorsed as aforesaid all of which receipts he prays may be taken and considered as a part of this his answer to the complainants said Bill of complaint and that he hath been advised that he is entitled to a credit for all the said several sums of money so by him paid as aforesaid and that now is and always hath been willing and ready to pay whatever he may justly owe upon his said purchase, and this defendant further answering saith that he hath been advised that an account ought to be taken for the purpose of ascertaining whether any thing and if any thing what is still due and to whom due upon his said purchase, and that all parties legally or equitably interested in the said premises and entitled to any part of the purchase money for the said premises should have been made parties in this cause, and this defendant denies all wrong and injury wherewith he stands charged in and by the complainants said Bill of Complaint, without that that there is any other matter or thing material or necessary for him to make answer unto and not herein and hereby well and sufficiently answered unto confessed or avoided traversed or denied is true, all which matters and things this defendant is ready to aver & prove as this Honorable court shall direct and award and humbly prays to be hence dismissed with his reasonable costs in this behalf most wrongfully sustained.

Alexr C Bullitt.

John Scott Solr for Deft.

City of Baltimore, Sct. — Be it remembered that on this 7th day of May in the year 1848 personally appears Alexander C Bullit of Sussex County in the State of Delaware the Defendant named in the foregoing answer before me the subscriber a justice of the peace of the State of Maryland in and for the City of Baltimore aforesaid and makes oath that the several matters and facts therein set forth and stated as of his own knowledge are true as stated and that the several matters and facts therein stated as of the knowledge of others he believes to be true.

Sworn Before. Thos. W Griffith.