This Defendant for answer to said Bill of Complaint, or to so much and such parts thereof as may be necessary for her to reply, answers and says, That she admits that John Davis on the first day of March 1848 applied for the benefit of the Insolvent Laws of Maryland, that Elie Beatty the Complainant was duly appointed his Trustee, and as such Trustee has filed his bond. This Defendant further admits that John Davis did, on the 6th day of October 1845, execute to a certain Charles W. Davis the deed of Trust, a Copy whereof is exhibited with said Bill marked Exhibit No. 1. This Defendant denies that the debts secured by said deed of trust are fraudulent and surreptitious, but avers and insists that they are bona fide debts for full and valuable Consideration

This Defendant denies that said deed was executed with the intent to hinder, delay or defraud the Creditors of the said John Davis not mentioned in said deed, and also denies that said deed was executed by said Davis with a view or under an expectation of taking the benefit of the Insolvent Laws. And this Defendant also denies that she knew of the insolvency of said John Davis at the date of the said deed, or of his intention to apply for the benefit of the Insolvent Laws and also denies that she colluded with the said John Davis to obtain an undue and improper preference. And this Defendant denies all and all manner of fraud with which she is charged in said Bill and prays to be hence dismissed with her reasonable costs and charge in this behalf most wrongfully sustained.

J. J. Merrick } Solicitors
George Schley } for Deft.

State of Maryland Washington County towit.

On this 20th day of December 1848 personally appeared before me the subscriber a Justice of the Peace of the State of Maryland in and for Washington County aforesaid, Elizabeth A. Watson of said County whose name appears subscribed to the aforegoing answer and made oath on the Holy Evangely of Almighty God that the matters and things stated therein are true to the best of her knowledge & belief.

C. Sheppard J.P.

It is agreed that the aforegoing answer shall be taken as the answer of Mary L. Watson who adopts the same as her answer.

Jno T. Mason Sol for Complt
Geo Schley Sol for Deft

Thereupon the said John Davis by Joseph J. Merrick and George Schley his Solicitors filed in Court here his answer to the foregoing Bill of Complaint, in the words and of the tenor following towit:

The Separate answer of John Davis of Washington County to the original Bill of Complaint of Elie Beatty Trustee in Washington County Court as a Court of Equity filed. This Defendant for answer to the said Bill of Complaint or to so much and such parts thereof as may be necessary for him to answer, answers and says that he admits it to be true as charged in said Bill, that he did, on or about the first day of March 1848, apply for the benefit of the Insolvent Laws of Maryland, that Elie Beatty of Washington County was duly appointed Trustee

for the creditors of this Defendant and that said Beatty has duly executed and filed his bond as such Trustee in Conformity with the requirements of law. That this Defendant further admits that he did, on or about the sixth day of October 1845, execute a deed to his son Charles W. Davis, conveying his real estate, personal and mixed, for the uses, purposes and trusts therein expressed and specified, a true Copy of which said deed he admits Complainants Exhibit No. 1. to be. This Defendant utterly denies that said deed was executed by him with a view and under an expectation of being an insolvent debtor and with an intent thereby to give an undue and improper preference to any of his Creditors and securities and with the view of creating fraudulent and surreptitious debts and with the view of hindering delaying and defrauding any of his Creditors in the Collection of their just debts, he is alleged and charged in said Bill of Complaint. And this Defendant denies that said deed was executed with any of the views or intentions so charged as above specified or with any illegal, Corrupt or immoral view or purpose or intention whatsoever. That said deed was, as this Defendant avers executed by the advice and at the urgent solicitation and request of his friend and legal adviser William L. Ross Esq of Frederick, and who was also one of the Defendants securities in a debt due to the Frederick Town Savings Institution, This Defendant denies that he intended or designed, at the date of the execution of said deed becoming an applicant for the benefit of the Insolvent Laws of Maryland but on the Contrary avers and maintains that at said time from the estimates of the value of his property and of the amount of his debts made by himself and others he this Defendant was under the impression that his estate was fully adequate to the payment of all his debts, both as a principal debtor and as security and that he confidently believed and expected that his estate would be speedily settled and his debts discharged. This Defendant avers & insists that the debts named in said deed of Trust are true and bonafide debts for value received, and were so, at the date of the execution of said deed and utterly and flatly denies that they were fraudulent and surreptitious as alleged and denies that this Defendant colluded with any of said creditors as they or any of them with him to give or obtain an undue and improper preference.

This Defendant would explain that since the making of said deed he has been advised that the debt due Everhart Reckley is not so large as stated in said deed Whatever the amount may ultimately prove to be, the debt itself is just and bona fide.

And this Defendant in answer to the Supplemental Bill filed by said Complainant, admits that he made the sale of the farm referred to, to his son John Davis Jr in the mode and for the consideration and upon the terms set forth and explained and decreed to be carried into effect by a cause in Allegany County Court, sitting as a Court of Equity, a Copy of the record of said cause is herewith exhibited and filed as part of this answer, which said record the said John Davis Sr the respondent in this Cause prays may be taken as his answer to said supplemental bill. This Defendant denies that he was largely indebted at the period of said sale. And this Defendant denies all such and all manner of fraud with which he is charged by said bill and prays that he may hence be dismissed with