Received October 20th 1851 to be recorded and same day recorded in Liber S.H.N. No 1 folio 502 &c one of the personal deed record Books of Anne Arundel County and examined by

Jos. H. Nicholson Clk.

And on the same day the Commissioner Wm. H. McPaslin made return of his said Commission with the answer of the Infant Defendant Samuel Holliday in the words following towit:

Maryland Sc: The State of Maryland To William H. McPaslin of Anne Arundel County Greeting

Thomas Nathan E. Berry, Guard Iver and William Hamilton Jr lately exhibited their Bill of Complaint before us in our Circuit Court for Anne Arundel County sitting as a Court of Equity against William T. Holliday, Caroline Holliday and others. And whereas we have by our writ lately commanded the said Defendants to appear before us in our said Circuit Court for Anne Arundel County, sitting as a Court of Equity at a certain day, to answer the said Bill of Complaint but for as much as the said Samuel Holliday is an infant under age and cannot answer the said bill nor defend this suit without having a Guardian assigned in that behalf: Nevertheless, therefore that we have given unto you full power and authority in pursuance of the special order of our said Court, to assign and appoint a Guardian for the aforesaid infant, and to take the answer of the said Infant by such Guardian to the said Bill and therefore we command you that at such certain day and place as you shall think fit, you go to the said Defendant if he cannot conveniently come to you, and assign and appoint a Guardian for the aforesaid Infant and to take the answer of the said Infant, by such guardian to the said Bill, on such guardian corporal oath, upon the Holy Evangely, to be administered by you, the said answer being distinctly and plainly written and when you shall have so taken the said answer you send the same closed up under your seal, together with your certificate of your having assigned and appointed such guardian as aforesaid, and this writ unto us in our said Circuit Court for Anne Arundel County sitting as a Court of Equity. Witness the Honorable Nicholas Brewer Circuit Judge of the Circuit Court for Anne Arundel County this 7th day of January A.D. 1853.

Seal

Test, N. H. Green Clk.

To The Honorable Nicholas Brewer Circuit Judge of the Circuit Court for Anne Arundel County.

The undersigned respectfully returns, that pursuant to the authority vested in him by the foregoing Commission he did in presence of the infant on the seventh day of January in the year eighteen hundred and fifty three assign and appoint Nicholas B. Worthington Guardian to the Infant in said Commission named, and did take the answer of the said Infant by the said Guardian on his Corporal oath, by the undersigned administered which answer hereto annexed is herewith returned, together with said commission. Witness my hand and seal the fourteenth day of January 1853.

Wm. H. McPaslin. Com.r Seal

The answer of Samuel T. Holliday an infant under the age of twenty one years by Nicholas B. Worthington Guardian in that behalf specially appointed, to the Original and supplemental bills of Complaint of Nathan E. Berry and others against William T. Holliday this Defendant and others, in the Circuit Court for Anne Arundel County, sitting as a Court of Equity, exhibited. This Defendant answering by his guardian aforesaid to the said Bill of Complaint says, that he does not admit the truth of the several matters and things charged and set forth in said Bill. Knows nothing thereof, and prays that the Court will protect his interest in the premises and he prays to be hence dismissed with his costs and so forth.

N. B. Worthington Guardian.

The Guardian above named makes oath on the Holy Evangely God, that the matters and things stated in the aforegoing answer, are true to the best of his knowledge and belief. Sworn to before the Subscriber Commissioner for that purpose appointed.

Wm. H. McPaslin.

And on the same day Caroline Holliday by her Solicitor Oliver Miller Esq filed in said cause her petition in the words following towit;

Nathan E. Berry & others vs William T. Holliday and Caroline Holliday his wife and others.	Circuit Court for Anne Arundel County. In Equity.

To The Honorable Nicholas Brewer Judge of the Circuit Court for Anne Arundel County sitting in Equity.

Caroline Holliday of Anne Arundel County one of the Defendants in the above cause respectfully suggests that she has interests involved therein inconsistent with and opposite to those of her husband William T. Holliday who is also a Defendant thereto. She therefore prays that she may be permitted to answer and defend this suit separately from her said husband as in duty bound.

Oliver Miller. Solicitor for Defendant

And afterwards towit on the 10th day of January 1853 the Judge passed in said Cause the following order towit: Circuit Court for Anne Arundel County. In Equity: Ordered that the Defendant Caroline Holliday, have leave to answer and defend this suit separate and apart from her husband as prayed.

Nicholas Brewer. Circuit Judge. January 10th 1853

And afterwards on the same day came Nicholas B. Worthington by Oliver Miller Esq his solicitor and filed in said Cause his answer to the said Bill of Complaint in the words following towit: To The Honorable Nicholas Brewer Judge of the Circuit Court for Anne Arundel County sitting in Equity. The separate answer of Nicholas B. Worthington of Anne Arundel County to the original and amended and supplemental bills of Complaint of Nathan E. Berry and others against this Defendant and others in Equity exhibited, This respondent reserving to himself all and all manner of exceptions to the manifold errors, mistatements and misrepresentations in said Bill contained, in answer nevertheless to so much thereof as he is advised it is material and necessary for him to answer, answering says That he knows nothing of the indebtedness of the said William T. Holliday to the Complainants or others as charged in said Bill, but he requires strict proof of all the claims of the Complainants and of all others that are filed or may be filed in this Cause. This respondent further admits that the said Holliday executed to him the conveyance referred to in the Bill as Exhibit A.B. on the seventeenth day of April eighteen hundred and fifty two, and respondent insists that by reason thereof he is entitled to have so much of the surplus proceeds of sale of the said property thereby conveyed as will secure the Claim of the said Caroline therein mentioned, paid over to him to be held by him according to the terms of said conveyance. This respondent denies that the said conveyance was executed by the said Holliday for the purpose of delaying and hindering the Complainants and his other creditors in the collection of their just debts, or of cheating or defrauding them out of the same, but he insists that the same was executed bona fide and for good and valuable consideration as therein expressed. And your respondent is advised and so charges that the said conveyance is a legal solid and operative deed, according to its terms and the true construction thereof, and that the said Holliday had good right to execute the same, and that it is a