Counsel of the defendant John Richey in his behalf as prayed by said Said, And afterwards the Sheriff of Harford County made return of Subpoena agreed the Defendants residing in Harford County And Cross Endorsed from except Samuel, And afterwards to wit on the 15th day of March 1837 the defendant Samuel Jemison Amer Jemison Wellem Jemison William Smallwood and Susan Smallwood by their Counsel Chs Scott Esquire files in said Cause their answer to the said Bill in the words following to Wit, To The Honorable Hargrave Bland Chancellor of Maryland The answer of Samuel Jemison to the Bill of Complaint of Parker Jemison, This Respondent saving and reserving to himself all advantage of Exception to the manifold errors insufficiencies and uncertainties in the said Bill contained for answer thereunto or to so much thereof as he is advised is material answer unto he answers and says that he knows nothing whatever of the several matters and things charged in said Bill but is informed and believes that John Richey was largely indebted to John Jemison the father of this Respondent at the time of his death and that the several Goods of said John Jemison as security for said debt, He also says he has no interest whatever in any of the Matters charged in said Bill and prays to be hence dismissed with his costs in this behalf most wrongfully sustained

Chs Scott for Respt.

The Complainant agrees to take the answer without Oath.

John H Brasier

To The Honorable Hargrave Bland Chancellor of Maryland

The separate answer of Amer Jemison to the Original Bill of Complaint of Parker Jemison. This Respondent saving and reserving to himself all benefit and advantage of Exception to the manifold errors uncertainties and insufficiencies in the said Bill contained for answer thereto he says that he has no knowledge of any of the matters and things charged in said Bill but is informed and believes that John Richey was largely indebted to John Jemison the father of this Respondent at the time of his death and that the several Goods or Sum mentioned in said Bill were assigned by the said John Richey to the said John Jemison as security for the payment of said debt, He also says that he has no interest in said Lands and therefore prays to be hence dismissed with his costs in this behalf most wrongfully sustained

Chs Scott for Respt.

The joint answer of William Jemison Nathan Smallwood and Juliana Smallwood to the Bill of Complaint of Parker Jemison

These Respondents saving and reserving to themselves all benefit and advantage of Exceptions to the manifold errors and insufficiencies in the Bill contained for answer thereto or to such much thereof as they are advised it is material to answer and they answer and say that they have no knowledge of the matters charged in said Bill but they are informed and believe that John Richey was largely indebted to John

Jemison the father of this Respondent William Jemison the father of whom has intermarried with this Respondent William Smallwood at the time of his death and that the several Goods of said Husband in said Bill mentioned amounted to said John Richey to the said John Jemison as security for said debt. They also say they have no interest in the said Husband in said Bill and pray to be hence dismissed with their costs in this behalf sustained

Chs Scott for Respt.

And at the same time the Defendant Jacob Jemison filed in said cause his answer to the said Bill in the words following to Wit

The separate answer of Jacob Jemison to the Bill of Complaint of Parker Jemison. This Respondent saving and reserving to himself all benefit of advantage of Exception to the manifold errors and uncertainties and insufficiencies in said Bill contained for answer thereunto or to so much thereof as he is advised this nothing of the Matters and things charged in said Bill he is informed and believes that the said Richey was largely indebted to John Jemison the father of this Respondent at the time of his death, And that said John Richey amounted to him the several Goods of said in said Bill as security for said debt.

This Respondent has no further information or belief in relation to any of the other matters charged in said Bill and prays to be hence dismissed with this behalf most wrongfully sustained

Jacob Jemison

The Complainant agrees to take the answer without oath.

John H Brasier Sol for Complainant

And afterwards to wit on the 16th day of June 1837 the defendant John Richey by his Counsel appeared filed in the said cause his answer to the said Bill in the words following to Wit

To The Honorable Hargrave Bland Chancellor of Maryland

The answer of John Richey to the Original Bill of Complaint and Cross Bill exhibited against him in the Honorable Court by Parker Jemison and the Defendants in the original Bill hereto for Cross Bill of this Respondent against Parker Jemison and others

Respondent reserving to himself all benefit of Exceptions to the said Bill for its many Insufficiencies and impertinences for answer Nevertheless to so much thereof as he is advised is material for him to answer admits the giving of the original Bill by the said John Jemison and that the said Bill was filed for the purpose of obtaining a reconveyance of the Lands and Premises therein mentioned upon payment of the money for which they were pledged as security and for the purpose of correcting errors and mistakes alleged to exist in the settlement of accounts between this Respondent and the late John Jemison whose Executor Complainant is and to ascertain the correct and true balance due from Respondent to the Estate of said deceased When the correct balance should have been ascertained Respondent as in his original Bill he alleges and as he knows and assumes is willing and