saving and reserving the benefit of all and every exception to the said Bill of Complaint for the manifold uncertainties imperfections and insufficiencies thereof for answer to so much thereof as is material to answer say that they admit that the said Hannah K Chase did execute and deliver to your Respondents the deed of trust whereof Exhibit A is believed to be a true Copy and had the same was Recorded at the time and in the manner therein endorsed but these Respondents distinctly and positively deny that the said deed was executed or delivered with the intents and purposes alleged in said Bill of Complaint, on the contrary these Respondents aver that the same was executed and delivered delivered by the said Hannah K Chase under the suggestions and advice of Judicious Friends for the sole purpose of securing beyond her power of revocation the disposition of her property already provided and settled by the said and Codicils therein referred to, that the said Hannah K Chase was fully competent to execute said deed of trust tho being advanced in years and exposed to the persuasions and influences of interested persons she very properly determined by her solemn act and deed to secure for posterity in such a situation that after her death it would certainly pass to the devisees and legatees mentioned in her said Will and Codicils subject only to and interest or enjoyment of the income thereof during the life of said Hannah K Chase and your Respondents are advised and insist that the legal effect of said deed was to secure the title and disposition of said property according to the causes set forth in the said deed of trust beyond the power of the said Hannah to alter or recall the same. Your Respondents further admit that they accepted said deed and the trust thereby imposed and since the death of said Hannah have duly qualified as her executors. These Respondents further insist that the Codicils executed by the said Hannah subsequently to the execution of said deed of trust are of no effect and cannot alter the uses of said deed, and they admit that exhibited by the Complainants is a true copy of the Will and Codicils. Your Respondents have no personal knowledge either before or after said Trust deed of trust and they require proof of the same and that the said Hannah received value for any Notes of hers that may be in the possession of Complainants or either of them and that said Notes were duly dated and executed as they import to be, And in case that it shall appear that the Complainants or either of them hold any Notes or Notes of said Hannah dated before the execution of said deed of trust your Respondents charge that the same were antedated and do also believe and charge that the said Hannah received no value therefor and that the same was held Known to the said Complainant or Complainants respectively when they received the same; and these Respondents further aver that whatever Note of any of the said Hannah's shall appear to be held by the Complainants or either of them, were each of all of them loaned to a certain William

Chase Barney Without any Valuable consideration and were by him passed to said Complainants respectively as usurious Loans and that the same are void and on the event that it shall appear that any consideration was given by said Hannah these Respondents charge that such consideration was passed to said Hannah by William Chase Barney they payee named in said Notes as a Loan and that said Notes were executed by said Hannah to secure the repayment of such Loan in usurious terms and that said Note and Notes are void and were passed to said Complainants respectively by said William Chase Barney for grossly inadequate Considerations and with full Notice to said Complainants respectively that said Notes and each of them were intended and designed to secure usurious Loans so as aforesaid made to Hannah, And these Respondents further plead and rely on the act of the Legislature of Maryland in such case made and provided for the limitation of actions, in bar of all proceedings on any Note or Notes held by Complainants or either of them which fell due more than three years before filing said Bill of Complaint, These Respondent Avers positively of the alleged deed from said Hannah to John B Thomas and they herewith file their accounts as Executors of said Hannah passed by the Orphans Court of Baltimore County which account is marked N W and N B W exhibit A. and prayed to be taken as part of this answer and these Respondents refer to the same as shewing the condition of the personal estate of said Hannah now to be administered and these Respondents pray to be hence dismissed with their costs in so far incurred in this behalf.

Robert J Brent Sol for Respondents.

State of Maryland Baltimore City to wit. On this 19 day of June A D 1862 before the Subscriber a Justice of the peace in and for the City of Baltimore personally appear Nathaniel Williams and Joseph B Williams and respectively made oath upon the Holy Evangely of Almighty God that the facts stated in the foregoing answer as of their own knowledge are true, and those stated as of the information of others they believe to be true

Sworn before John J Snyder.

N W and N B W Exhibit A

Hannah K Chases 1st Administration
account
& Baltimore County Sct

The first account of Nathaniel Williams and Joseph B Williams Executors of Hannah K Chase deceased.

These accountants charge with an Inventory of the personal Estate of the deceased returned the 3d day of May 1848 amounting to $1677.37

And with Cash received from the Said Equitable Society 55.73

$1733.10

And they crave an allowance for the following payments and disbursements.