his creditors and in secret trust for himself now has to offer any such proposition to his creditors as alleged in said Bill of Complaint. This Respondent admits that his indebtedness to Robert Moore and Brother exceeds $1000 and that there was due at the time of of filing the Bill aforesaid about $300 and that he is indebted to other creditors about $14,000 This Respondent denies that at the Execution of the Deed from Thomas J Owens to his Wife Caroline Blendheim to Hertz Blendheim had any desire to defraud or defraud his creditors for he neither had the power nor the wish so to do. He had no control of the subject for the property was bought with her money it was so stated to Thomas J Owens and others the deed was made under her orders and she insisted in its being made direct to her, It was settlement pencil upon record and notice thereby given to all his creditors and to denies all charges of a scheme to defraud enshare and deceive his creditors but he has delivered to his Trustee every dollars worth of property he possesses in any way or form, This Respondent also denies the allegation that his Wife Caroline Blendheim had no separate Estate wherewith to buy the property in question but was that she had at the date of the deed aforesaid more than sufficient to pay the purchase money for said property and it was paid out of her funds and was not this Respondents and had never been used by him in his business or withdrawn from any funds of his or in any manner being under his control,

And in answer to the interrogatories specifically propounded to him in the said Bill of Complaint he says that the money with which the fund for the property in Pulaski Street was kept by his Wife and she had been so kept for some time in the dwelling house where they resided in a bureau drawer, as her own private money, that this Respondent was not present when the money comprising the largest part of the purchase money was paid to her, it was delivered to her in her own hands by a Mr Meyer who was in



this City in 1857, as she informed this Respondent some time afterwards for she did not at first disclose to him that Mr Meyer brought any money to her at the time to wit that said money was a remittance to her from Germany, but where said Meyer lived or to what post office or store this Respondent cannot say. This Respondent says that he cannot tell of his own knowledge in what form the said number statement that it was paid to her in gold for he never saw it until she showed it to him and never handle one dollar of it except to count it when it was paid to Owens for the property in question,

And this Respondent further saith that he has made full answers to all the allegations and interrogatories of said Bill prays to be hence dismissed with his reasonable costs in this behalf expended sustained &c. And as in duty &c he will ever pray &c

William Pinkney White
Wilson A. N. Carr Jr Respondents.

And thereupon the said Caroline Blendheim by her Solicitors aforesaid filed in Court here in said cause the separate answer to the foregoing Bill of Complaint in form following to wit.

To the Honorable William George Webb Judge of the Circuit Court for Baltimore City

The separate answer of Caroline Blendheim to the Bill of Complaint of Robert Moore and others against her and Hertz Blendheim in this Honorable Court Exhibited.

This Respondent saving to herself all Exceptions which under the circumstances she might have to the said Bill as to form or substance thereof answers the same as follows.

It is admitted by her that Robert Moore and Brother have been conducting business in the City of Baltimore as Dry goods Merchants but of their transactions with her husband and his indebtedness to them she knows nothing and therefore neither admits nor denies the allegations thereof in said Bill, Nor does this Respondent admit the insolvency of her husband at