foot by the said Complainants.

This respondent utterly denies that he has ever threatened or intended as falsely and scandalously charged or imputed in said bill to misapply the proceeds of the sale of said trust estate or any part of them; He has said it was to be regretted (and such is his sincere opinion still) that the said Complainants Charlotte Wilkins, and her three unmarried children should waste their substance in idle litigation and its costly incidents. But this Defendant, however unreasonable their own conduct might be never intended or desired to subject them or the trust estate, as he never has in fact subjected them - to unnecessary expenses of any kind.

This respondent further answering says that one Burke, whom he had been previously obliged to forewarn from taking wood from said property, and whom he understands to be the friend of the Complainants mentioned in the bill, did come to this respondent and ask him if he would not postpone the sale; and this defendant in reply told him he did not perceive that Mrs. Wilkins had anything to gain by postponement, but that he would consult his Counsel and if they advised putting off the sale, would do so, and this respondent denies having made to said Burke the declaration charged in the said bill.

Further answering, this Defendant says that the sales heretofore made by him were good, and the prices obtained fair and reasonable, being more than twice as large - having respect to the quantity of interest sold, as Mr. Blackburn obtained at the said sale made by him as Trustee as aforesaid in March 1860, and in proceeding after the lapse of eighteen months from the date of the trust, and the year from the large advances above mentioned, to offer the remaining lands at public sale in obedience to the directions of the said Deed, this respondent had no purpose but to execute his trust with diligence and fidelity.

This Respondent further answering says that not only was the course in the former sale approved by the said Michael P. C. Wilkins and Susan Ehrman, who if there had been cause, would have had the best right to object and also by the Circuit Court for Baltimore County, to whom the Complainants, Charlotte, Charlotte A. Susan and Edwin S. Wilkins referred the question of its propriety but there was every prospect that the second offering which he proposed to make which interdicted by the said injunction in this cause would have been attended with good success but for the action of the said Complainants and this Respondent was making said sale in accordance with the express request of the said Sophia Ehrman & Christian Ehrman her husband, and Michael P. C. Wilkins and he charges that the said Christian and Sophia Ehrman although they have been joined as co Plaintiffs do not in fact desire to prevent or delay a sale as proposed to be made by him.

This Respondent denies that this is an unsuitable time for the sale of farming lands and even if it were, any advantage to the true Complainants in this case to be hoped for from delay,

would be more than over balanced by the accumulation of interest on their debts, while Mr. Ehrman & his wife and Michael P. C. Wilkins, who have no debts to pay, and consequently no cause for undue haste, desire a speedy sale.

Fiendly this respondent denies, that he has been influenced in the execution of his trust by any consideration either of self interest as falsely and wilfully charged in one part of said bill, or of revenge against some of the Complainants for their previous interference as fancifully imagined in another, and he confidently refers to his whole previous proceedings in the trust for his vindication from such malicious and feeble aspersions. He believes that the said Charlotte Wilkins and her three children, who are in concert with her, in the course they have thought proper to pursue since they excepted to the ratification of the sales of 22nd October 1861 have been acting directly against their own interest, and re-adopting the same unsound and visionary ideas which heretofore brought their affairs into the disastrous conditions from which the conveyance in Trust providing for an entirely different method was designed to rescue them. But if it were otherwise, this respondent cannot forget that they are not the only cestuis que trust, and that the rights and interest of the other two Children of the said Charlotte must also be regarded. They united in the Conveyance for the purpose not only of gaining relief for the Complainants but also of obtaining the conversion of the whole estate into money, so that they might severally receive without delay the present worth of their reversionary interest and the directions of the deeds of Trust (which have the same meaning now as when he assumed the trust, and before he made advances for its benefit) are, he respectfully submits, clear and positive. Having thus fully answered the said Bill, this Defendant respectfully submits to your Honor the question how far this Court, or the Circuit Court for Baltimore City ought to take jurisdiction in the premises, seeing that the subject of the execution of said trust is already before the Circuit Court for Baltimore County, in the Equity proceeding hereinabove mentioned and exhibited.

All of which matters and things this Defendant is ready to aver and prove as this Honorable Court shall direct and humbly prays to be hence dismissed with his reasonable costs in this behalf most wrongfully sustained.

R. J. Gittings
J. W. Machen
Solicitors for Adam Denmead

Baltimore City, SS:

Before the subscriber a Justice of the Peace of the State of Maryland in and for the City aforesaid personally appeared on this seventh day of May in the