This Respondent avers and makes known to the Court that she is advised and believes that the said George Lynn died largely indebted to various persons his debts exceeding in amount the estimated value of all his property that the other creditors had no notice of the said instrument of writing, other actual or in contemplation of law, that it cannot be considered as alleged by the Complainant that the knowledge of the said James M Schley (trustee) of the existence of said instrument of writing was any notice to them and the said James M Schley when applying the proceeds of the sales made by him as trustee never at any time had resort to the said instrument of writing or considered the same as having any bearing or effect upon the disposition or distribution of said proceeds. This Respondent therefore denies the right asserted by Complainant to have and receive from the said James M Schley trustee any part of the proceeds of sales of land made by him as such trustee appertainable to the said George Lynn in his life time or to his heirs and representatives since the death according to the quantum of interest or estate in said lands of which the said George Lynn died seized and possessed. She also denies the right asserted by Complainant to have and receive an equitable proportion of the rents accruing from the Rose Hill Cement Works under the lease before mentioned shown by Complainants Exhibit No 4 to be vested according to the part ownership of the said George Lynn in the said Cement property. She also denies that the right asserted by Complainant to have and receive from the Mount Savage Iron Company or the person appointed by the benificiaries of the trust thereof of the Wharf fees under the before mentioned agreement of the 8th September 1849 or from any other agent such part thereof as was appertainable to the said George Lynn in his life time or to his heirs and representatives since his death.

And she particularly denies the right asserted by Complainant to have and receive from the before mentioned Jonathan W Magruder such share of said wharf fees and of the rents, issues and profits of the said Rose Hill Cement Mines Quarries Kilns &c and of the rents issues and profits of other the Rose Hill Estate appertainable from time to time to the said George Lynn during his life time or to his heirs and representatives since his death. And this respondent denies all other matters and things in said Bill of Complaint contained pretending or attempting to show that the said instrument of writing shown by Complainants Exhibit No 2 has any other operation or effect at law or in Equity excepting as a mere evidence of debt between the parties thereto. And she again particularly denies every matter and thing alleged or asserted by the Complainant in denial or diminishment of her right or rights of dower in and to all the estate at law or in equity of which her said husband George Lynn was seized and possessed from the time of their intermarriage until his death as aforesaid on the 10th day of December in the year 1860. And to contrary she asserts and claims as the widow of the said George Lynn deceased an equitable right of dower in and to all the lands and estate conveyed in trust as aforesaid to the said James M Schley and in and to all other real estate to which the said deceased was in any manner entitled at law or in Equity after their said intermarriage and until the time of his death. And also she claims the

to the right of dower in and to all the rents issues and profits accruing from the said real estate since the death of the said George Lynn, all which matters and things this respondent is ready to aver and maintain and prove as this Honorable Court shall award and humbly prays to be hence dismissed with her reasonable costs and charges on this behalf sustained. Virginia Lynn

by her Attorney and Solicitor Samuel McSimmons

State of Maryland Allegany County to wit. I hereby certify that on this 14th day of September in the year 1862 before me the subscriber a Justice of the peace in and for said County and State aforesaid personally appeared Virginia Lynn the defendant named in the foregoing answer and makes oath that the matters stated in the said answer are true to the best of her knowledge and belief.

Andrew Sonder J. P.

And afterwards to wit on the 4th day of October in the year last aforesaid was filed in the court here the answer of John C Steven and wife in the words & following to wit:

John T Lynn	}	In the Circuit Court for Allegany County as a Court of Equity No 1385
vs		The answer of John C Steven and Mary Steven his wife to the Bill of Complaint of John T Lynn
Virginia Lynn & others	}	

against them with others in the said Circuit Court for Allegany County as a Court of Equity exhibited. This Respondent now and at all times hereafter saving and reserving all manner of exceptions to the allegations and manifold imperfections of the said Bill of Complaint nevertheless for answer to the same or so much or such parts thereof as they are advised is necessary and material for them to make answer unto answer and say. That they admit the seizen and ownership of the said George Lynn together with Frederick A Schley Anna B Seighman, William Lynn James C Lynn Mary Magruder wife of Jonathan W Magruder and the Complainants as tenants in common prior to the third day of October in the year 1849 of the property described in the Bill of Complaint as known by reputation as the Rose Hill Estate subject to the life estate therein of Mary Ann of Leard Lynn deceased as is alleged in the said Bill of Complaint and these Respondents believed to be true and therefore further admit that the said tenants in Common with the respective wives of the said George Lynn William Lynn and Complainants and with the said Jonathan W Magruder and Mary Lynn did on or about the third day of October in the year 1849 convey to one certain Erastus Edgerton then of the said County and State the aforesaid property known as the Rose Hill Estate in trust for certain purposes but the proper quantity and description of the property mentioned in said deed the particular uses and trusts therein set forth, or whether the said property or the said uses and trusts were the same with those specified in the deed of trust to James M Schley hereinafter mentioned these Respondents do not know.

And these Respondents further admit that afterwards and on the 17th day of December in the year 1850 the said Mary Lynn Anna B Seighman James C Lynn John T Lynn Rebecca B Lynn William Lynn Anna S Lynn Jonathan W Magruder Mary Magruder George Lynn Virginia Lynn Frederick A Schley and Erastus Edgerton executed acknowledged and delivered unto a certain James M Schley a deed of trust conveying the said Rose Hill Cemetery Estate as the same is in the said conveyance described to the said James M Schley for the uses and upon the trusts therein specified