following to wit:

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

The joint and several answers of Conrad Leiman, Harman Schaferman and William Seip to the bill of complaint of William O'Brien heretofore filed against them in this honorable Court.

For answer to the said bill, or to so much thereof as it is necessary for them to answer, these respondents answering say that the case made to the said Conrad Leiman by Alexander Gould, as stated in the said bill of complaint, was a bona fide transaction and he believes the said complainant has dated it correctly in his bill; it is also true that there is on the records of the court of Common Pleas of Baltimore City a judgment against your respondent, the said Conrad Leiman; but that either a judgment was confessed by him, or by any person on his behalf with his knowledge and consent is not true; and he is confident that a proper investigation of the said cause will establish that he never was fairly and justly indebted in the said sum. Your respondent cannot recollect the said claim; and he believes he would be fully cognizant of it, if it were right and proper. It is also true that your respondent Conrad Leiman applied for the benefit of the insolvent Laws on 22d May A.D. 1854 of this State and in his Schedule averred he had no other assets, and that he was discharged finally and fully as in the said bill of complaint is stated and averred. It is also true that this respondent Conrad Leiman conveyed the property and leasehold interest in the lot leased from Alexander Gould, as in the said bill is named to Harman Schaferman, another of these respondents: but it is not true that there was any secret trust for the use and benefit of the said Conrad Leiman, existing between him and the said Harman Schaferman, when the said conveyance was made — And no resulting trust or any other kind of trust was ever contemplated by any of them. Harman Schaferman took the said property as in the said conveyance is stated and he has paid the consideration for the same that is specified and named in the said conveyance. It is true that the said Conrad Leiman has frequently, perhaps generally, but not always collected the rents of the said property, but he has always accounted to your respondent, Harman Schaferman for the same. It is not true, as alleged in the said bill of complaint, that Conrad Leiman appropriated the said rents to his own use, nor is it true as

alleged in the said bill that the said Leiman was not indebted to the said Schaferman to any amount when the said conveyance was made: Nor is it true as alleged in the said bill of complaint that the said conveyance was made with the intent and design of the parties thereto, to hinder, delay, or defraud the creditors of the said Leiman.

William Seip, trustee of the said Leiman and one of the defendants named in the said bill of complaint, answering says, that he has no personal knowledge of the matters and things in the said bill of complaint contained, and therefore he can neither affirm nor deny them. He therefore prays your Honor to do as seems to you proper in the premises and to allow him his reasonable costs, incurred in this behalf.

These respondents Conrad Leiman and Harman Schaferman each of them on his own behalf, denies any collusion, or fraud in the matters named and referred to in the said bill of complaint, and again reiterate the fairness and bona fides of the said transactions.

This respondent Harman Schaferman most respectfully submits to your Honor that he will specify if necessary how the consideration for the said conveyance was paid: but he is advised that it is a matter of testimony and having answered as fully as is required, he prays to be dismissed hence with his reasonable costs, and likewise also Conrad Leiman asks your Honor to allow him his costs. And as in duty bound these respondents will ever pray &c

Wm H Cowan
for resp.ts

And afterwards to wit on the Twentieth day of April in the Year last aforesaid the said Complainant by his Solicitor aforesaid filed in said cause the following General Replication to the answers of the said Defendants to wit:

O'Brien vs Leiman &c	In Circuit Court Mr Turner Enter a general replication to the answers of the Defendants in the above cause T. Mc Laughlin Sol. for Compt.

And thereupon the following Agreement was filed in said cause to wit:

O'Brien vs Leiman &c	In Circuit Court for Baltimore City Let a commission to take testimony issue in the above cause directed to Francis D — Tormey Commissioner. T. Mc Laughlin Solicitor for Complainant Wm H. Cowan Solicitor for Defendant