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other imperfections in said Bill of Complaint contained. For answer thereto or to so much thereof as he is advised is material or necessary for him to make answer unto this Respondent answering saith that it is true that said Josephine is the wife of Robert M. Chatterton — and in the year 1854 resided with her said husband in Philadelphia but he denies that said Daniel T. Chatterton (who was the brother of this Respondent — and of said Robert) conveyed to her the lease of her store No 211 second street Philadelphia and the Cabinet furniture stock fixtures &c as in said Bill is falsely stated, or any part thereof. On the contrary he avers that the said Daniel T. Chatterton was a minor at the time of his death and that he never had any right title or interest in or to the said property. That about 1853 said Robert went into business in Philadelphia at the said store No 211 North second street (and afterwards at No 35 North 2nd street under the name of Daniel Chatterton and continued to carry on the business under that name until August 1855 when his stock of goods were all sold out at Sheriffs Sale under an execution issued at the suit of one Reefsnyder, and that the furniture and goods with which said Robert was carrying on business as aforesaid and which were sold as aforesaid at Sheriffs Sale are the same furniture stock &c which the said Josephine now fraudulently pretend were conveyed to her. And if she holds any instrument of writing purporting to be a deed conveying said property to her as in said Bill is stated he charges that the same is fraudulent & void. Further answering this Respondent says, that he has no knowledge of the said John A. Milligan or of any

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transaction between him and said Complainant, but he does know that she had no considerable sums of money of her own to loan and was unable for want of means to make any of the pretended investments or purchases stated in said Bill, and he positively denies that she purchased of said John A. Brown the House and lot described in said Bill as being situated in Eleventh Street in the City of Philadelphia. On the contrary he avers that the said House and Lot was purchased by this Respondent with his own means and for himself alone. That the first payment amounting to six hundred dollars was paid by this Respondent who went in person to the Conveyancers office to make the payment, but the papers not being ready, and being compelled to leave the City at the instance of the Conveyancer he left the money with his said Brother Robert to be paid over by him, which was done, and the residue of the purchase money was paid with the proceed of property belonging to this Respondent. That in March 1856 this Respondent purchased of one Refsnyder who was doing business at No 207 Wd street in Philadelphia the stock of goods furniture &c and placed his brother Robert M. Chatterton in charge who attending to the business for your Respondent from that time until some time on or about October 1856, when by this Respondent orders the whole stock which was purchased and paid for by Respondent and belonged to him, or all that remained on hand was sold at auction, and the proceeds of these goods and other monies of Respondent which come into said Robert hands went to pay for the said House and lot on Eleventh Street and the house and lot on Cox Street in Complainants Bill mentioned