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Andrew McSaughlin and Ephraim K. Barnum, by their Solicitor, filed in said cause their joint and separate answer to the said Bill of complaint in form following to wit:

To the Honorable William Krebs

Judge of the Circuit Court for Baltimore City:

The answer, joint and separate of Andrew McSaughlin, Zenas Barnum, Richard Barnum, Ephraim K. McSaughlin, David McSaughlin, William B. McSaughlin and Augustus McSaughlin, to the Bill against them and others in your Honorable Court exhibited, by David Barnum and Augustus K. Barnum, styling themselves infants, saving to themselves the benefit of all exceptions on all any grounds to said Bill, all the said above named Defendants say, that they admit that David Barnum, the testator mentioned in the Bill, died leaving a will, of which a writing, as an official copy from the Records of the the office of the Register of Wills of Baltimore City is exhibited with the Bill, and that said will was duly proved before the Orphans Court of Baltimore County, (now of Baltimore City.) And these Defendants admit that said David Barnum, the testator, left the children (as his only issue) who are named as such in the Bill, and that of said children, Ephraim Kirby Barnum and Augustus Barnum and Frances McSaughlin, have departed this life; that said Augustus Barnum left as his only issue, the complainants, his children; and that said Frances McSaughlin left as her only issue the children named as

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here in the Bill, and likewise, however, Ann Barnum, the wife of said Zenas Barnum. And these Defendants further state, that said Ephraim Kirby Barnum died without leaving any issue, but leaving a widow (Caroline) to whom he devised all his estate of every kind. And these Defendants further answering say, that said David Barnum, the testator, died seized and possessed of the pieces of ground constituting the City Hotel property in the City of Baltimore mentioned in the Bill; but that within and as part of the real property used for said City Hotel, and covered by the structures making up the City Hotel, was, and is, a piece of ground in fee simple, which was, at the death of the testator, the sole estate of the testator's widow, Ann Kirby Barnum, and which is mentioned in the said will as said Ann's property; and as the consideration (as and for a rent thereof.) of granting to her in the will an annuity of three hundred dollars for her life. And these defendants further answering say, that said pieces of ground owned by the testator are, and yet are, in part (and chiefly) leasehold, and in part in fee simple; and are described in the deeds following, to wit:

The Leasehold Grounds

Deed (for a term renewable forever) from George Brown to David Barnum, dated the 23 September 1825, and recorded in Liber W.G. No. 177, folio 631, &c

Deed (for a term renewable forever) from William Gilmor to David Barnum, dated 20 April 1838,