on the contrary his character was that of an obstinate and self-willed man, predisposed to resist interference with his personal affairs. And he also denies that he or his mother ever attempted or sought to influence him, or induce him in the matter of the execution of the deeds aforesaid alleging and charging that he never in his life spoke a word to him on the subject of their execution.

This respondent further answering says that he knows nothing of the skill or ability of Amos Richards, as a conveyancer but he is aware that he was esteemed an upright honest person and that it was his business to prepare titles and he is aware that on previous occasions he rendered such services to the testator Abraham Groff. And your respondent utterly denies that there was any mistake in the preparation of the said deeds: or that it was intended or designed that his said mother should merely take a life estate thereby.

That in the first place he wanted to make the conveyance asks is informed and believes immediately to her, but was advised that it could not legally be done, but must be conveyed and reconveyed as was the course adopted by him on that suggestion. That he frequently heard the said Groff, testator declare, that after his death by operation of the said conveyances, and will the property named belong to your respondent, and at those times in the presence of his wife, would express his gratification that he had made such a disposition of that portion of his estate. And he also avers that he has repeatedly heard the said Groff declare that he was disaffected towards his children because of their neglect and inattention to him.

This respondent having made full and true answers to all the allegations of complainants said bill material for him to answer asks, that said bill may be dismissed with his reasonable costs in this behalf sustained and as in duty bound he will ever pray &c

O. F. Hack Solr for respt.

On the 23rd day of May 1866. before the subscriber a Justice of the Peace of Baltimore County personally appeared Edward A. Pelzer respondent and made oath in due form of law that the matters stated in the foregoing answer are true to the best of his knowledge and belief.

W.D.J. R. J. Smith J. P.

Costs

13th Decr 1867 Order of Court for hearing on the 21st Inst fd.
12th June 1869. Petition for leave to amend Bill fd.
Same day Leave granted Docket Entries

And afterwards to wit on the day and year last aforesaid, the said Francis B. Groff, Executor of Abraham Groff, deceased, William T. Groff, & Mary A. Todd, by A. W. Meachen and A. F. Meusselman Esquires their solicitors, filed in the Circuit Court the following

amended bill of complaint, to wit.

Francis B. Groff, Executor of Abraham Groff, deceased and others vs. Edwin Pelzer	In the Circuit Court for Baltimore County. In Equity

To the Honorable the Circuit Court for Baltimore County.

The amended Bill of complaint of Francis B. Groff Executor of Abraham Groff, deceased William T. Groff & Mary A. Todd, humbly shows to your Honors that not waiving any of the matters and things stated and charged in their said original bill, but still insisting thereon, they do further represent that neither the consideration of one thousand dollars mentioned in the said deed of 28th April 1858 from the said Abraham Groff and Susan Groff his wife, to the said Amos Richards, nor any other consideration whatever, was paid or given by the said grantee to the said grantor, Abraham Groff, and therefore the conveyance being without valuable consideration, a trust resulted, or upon the principles of Equity was and is implied to and in favor of the said Abraham Groff his heirs and assigns: and the subsequent deed from the said Amos Richards to said Susan Groff being also unsupported by any valuable consideration moving between the parties, no estate or interest equitable passed from the said Amos to the said Susan by vertue thereof.

And your orators further pray in addition to the relief specially prayed in their said original bill or the case the same should not appear to your Honor proper to be granted, that it may be adjudged and declared that under said deed from said Abraham Groff & wife to Amos Richards a trust resulted to and in favor of the said grantor and his heirs and assigns, and that no equitable interest or estate passed from the said trustee Amos Richards to the said Susan Groff: and that a conveyance of the legal estate of said land mentioned in said deeds from the said Edwin Pelzer, son and heir of the said Susan Pelzer to your orators may be decreed, and that your orator may have such further or other relief in the premises as the nature of the case may require.

And that the said Edwin Pelzer may be required by writ of subpoena or other proper process or proceeding to answer this amended bill as well as said original bill & abide by & perform such decree in the premises as your Honors may deem meet & equitable to pass &c

A. W. Meachen
A. F. Meusselman for complts.

And afterwards to wit, on the day and year aforesaid, the said Edwin Pelzer by O. F. Hack Esquire, his solicitor, filed in the Circuit Court here the following answer to the amended Bill of complaint to wit.

To the Honorable the Judges of the Circuit Court for Baltimore County. In Equity.

The answer of Edwin Pelzer to the amended bill of