of complaint of Francis B. Groff, exor & others,
This defendant hereby reserving to himself the right of excepting to the filing of said amended bill respectively shews.
That it is true the deed from Groff testator mentioned in said bill discloses a consideration of one thousand dollars, that the said deed to Amos Richards was made for the purpose, as the testimony already taken discloses, of reconveyance to the said Susan Groff wife of testator, between whom and grantor there was no pecuniary consideration.
That it is not competent for grantor to deny the consideration as named in said deed, that he is estopped in law and equity to defeat his own conveyance by the allegation of want of consideration &c.
And this respondent says that after having made full answer to said bill, he asks to be hence dismissed &c

O. S. Hack Solr for resp't.

And afterwards, to wit, on the day and year aforesaid, the following general replication was filed to wit:

Francis B. Groff, Executor of Abm. Groff, & others vs. Edwin Polzer	Mr. Ady Enter the general replication to the answer of defendant to amended bill A. W. Machen A. S. Mousselman Solrs for complainants

And afterwards, to wit, on the 12th day of August in the year 1869, Robert L. Rogers Esquire one of the commissioners to whom the aforementioned Commission was issued, made return of the same, to the Circuit Court here, together with his proceedings thereunder, the testimony of which is as follows to wit

Francis B. Groff, Exor. of Abraham Groff, dec'd, William G. Groff & Mary A. Todd vs. Edwin Polzer	In the Circuit Court for Baltimore County on the Equity side thereof.

Amos Richards produced on behalf of complainants

First Interrogatory. State your age, residence, and where you resided in the year A.D. 1808?
Answer. I am about seventy four years of age, and at present reside at No 279 Hillen Street in the City of Baltimore, and in the year 1808. I resided in Baltimore County on the Hanover Turnpike about twenty miles from Baltimore City.

Second Interrogatory. Are you or not acquainted with

any of the complainants in this case – if so – which of them and how long have you known them?
Answer. I am acquainted with Francis B. Groff, and have known him twelve or fifteen years. I do not know the others.

Third Interrogatory. Are you or not acquainted with Edwin Polzer – the defendant, and if so how long have you known him?
Answer. I am and have known him ten or twelve years.

Fourth Interrogatory. Did you or not at any time receive instructions from Abraham Groff, as to the survey of the property mentioned in the proceedings in this cause or as to the preparing of conveyances of said property – if yea – state when said instructions were given or survey made, and state all the circumstances complied therewith as near as your memory will enable you to?
Answer. I did receive instruction in regard to the survey and conveyance of the property mentioned in the proceedings in this case from Abraham Groff, in the spring of the year eighteen hundred and fifty eight. When he applied to me to do the well the object to be accomplished was to effect a conveyance from him to his wife of a part of the property. When I made the survey he told me he wanted to execute a deed to his wife for the property on which his buildings and tenements stood. I told him he could not convey the property directly from himself to his wife, and advised him to do it through the intervention of some third person. I asked him why he wished to make the conveyance He said that she had been signing her rights away to the property and he wished her to have a home in her old days so that if he should be taken away, she should not be disturbed in her old days. The object to be accomplished was to secure her a home in case of his death. They both consulted about the matter in my presence and I advised them, as I before said to effect the matter by the conveyance through a third party. He wished her to have a home beyond peradventure after his death. Accordingly, after consulting with the, under the instructions of Abraham Groff, I prepared a deed of the property on which the dwellings were located, as I before said, which is the deed in these proceedings dated 28th of April A.D. 1808 from Abraham Groff and wife to myself, and on the next day the 29th of April I and my wife executed a deed of the same property in pursuance of said instructions and understanding, to Susan Groff the wife of Abraham, and she Susan executed a last will and testament which I also prepared in pursuance of her instructions, which said Will and Testament was sufficient to convey real estate and by which she devised the same property to her husband, Abraham Groff for life and after his death remainder to her son Edwin Polzer the defendant in this cause. The consent of Abraham Groff was given in writing by him to this last Will and Testament at my advice in accordance with the Laws of Maryland in such cases.