

Q. Has such possession been open, notorious, continuous, hostile and with full claim to color of title and so on?

A. Yes, we do not know of anyone else who has ascertained any claim or title to the land in question.

Q. How have you determined the heirs at law and next of kin of Ezra C. Wachter?

A. Through the help of Carl Holtz, who is the Reporter to the Circuit Court and who is a relative either through his family or that of his wife.

Q. Who were the heirs at law of Ezra C. Wachter as you have learned or know of them?

A. Caroline S. Mort who has now died and survived by Spencer Mort, her only child; Emma Broadrup who is now deceased and survived by Olive J. Lathrum; Dr. Earl E. Broadrup and Ralph D. Broadrup; Reverdy Wachter who is now deceased and survived by Lawrence E. Wachter and George Carl Wachter; Spencer Wachter, who is now deceased and survived by Cora Wachter Staley; Clyde C. Wachter, LeRoy H. Wachter, Blanche Wachter Summers, Hanson S. Wachter and Mamie Wachter, now deceased, who was survived by children, namely Arthur G. Myers, George R. Myers, Mary Myers Estep and Josephine Myers Stauffer; Addie C. Holtz, now deceased, and survived by Carl E. Holtz and Claude S. Holtz, who is incompetent, and for whom Carl E. Holtz has been appointed guardian; Harvey E. Wachter, now deceased who is survived by Ruth J. Boone, Pauline H. Heerd and Thelma I. Colliflower; Lloyd W. Wachter who is now deceased, and left no children surviving him, and the children and the heirs at law of the deceased children of the Testator are his heirs at law.

Q. Do you request that the Court pass a Decree in this matter?

A. Yes, I would like to ask the Court to pass a Decree to remove the cloud from the title to my real estate which I now own and to enjoin the Defendants named herein from asserting any claim of claims against said property.

TO THE GENERAL INTERROGATORY: (Propounded by Mr. James:) Nothing further.

Melvin C. Keyser
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