

Oliver H. Keefer, a witness of lawful age, produced on behalf of the Complainant, having been first duly sworn, deposes and says:

Q. Please state your name and residence?

A. My name is Oliver H. Keefer and I reside at 322 North Market Street, Frederick City, Maryland.

Q. What relation are you to Joseph E. B. Smith, deceased?

A. I am a nephew of Joseph E. B. Smith.

Q. When did your uncle die?

About the 14th day of May, 1939.

Q. Was your uncle married?

A. No my uncle never married.

Q. What heirs did he leave surviving him?

A. When my uncle died he left the following heirs at law:

Annie V. Stultz, a sister, whose husband's name is William Stultz, who reside at New London, Frederick County, Maryland; Lillie I. Keefer, a sister, widow, who resides at 54 East South Street, Frederick, Maryland; Harry Smith, a brother, unmarried, who resides at Mt. Zion, Frederick County, Maryland. Mrs. Lillie I. Keefer is my mother. My father died about 5 years ago.

Q. Mr. Keefer when your uncle, Joseph E. B. Smith, died did he own any real estate and if so where located?

A. Yes, he owned a tract of land with a house on it in Ballenger District, Frederick County, Maryland, and also several lots in Frederick City.

Q. From whom did your uncle, Joseph E. B. Smith, purchase the land located in Ballenger Election District?

A. My uncle purchased this lot from Lester T. Stine and Mary A. Stine on June 30, 1930.

Q. I am now handing you a certified copy of a deed from Lester T. Stine and Mary A. Stine, his wife, to Joseph E. B. Smith, dated June 30, 1930, which has been marked exhibit A in this proceeding and prayed to be taken as a part of the bill of Complaint. Will you explain what this deed represents?

A. It represents the conveyance whereby my uncle, Joseph E. B. Smith