

A. I have nothing. The only thing I have is where the fence lines have always been and they went six feet in front of the house. That is all I can tell you.

Q. Whether those fence lines six feet in front of the house extended out into any portion of the highway, you don't know, do you?

A. No. All my life I have always heard my father say he paid taxes for everything from the country club to the church and when the land was sold they took the land from the center of the road as a point of measurement.

Q. What do you mean when the land was sold?

A. We sold one small piece of land to George Summers which was an acre and adjoined the Cline property, and they surveyed to the middle of the road. They said you paid taxes to the middle of the road.

Q. Where is this George Summers acre with reference to this house?

A. On the north side of the road approximately 400 yards south of our property.

Q. And the balance of the land north of the road is what you sold to Mr. Grove - or your mother sold to Mr. Grove?

A. That's correct.

Q. Now, Mr. Summers, you have no knowledge of your own, have you, as to how wide this road is supposed to be or anything about the right of the state in the road, or do you have?

A. I always understood there was 60 feet of road.

Q. And how did you understand that - just through the talk in the family?

A. That was one^{way}/and since I got involved in this. The only other time I was involved in roads was 12-13 years ago when they were buying up this extra land and they brought out that it was 60 feet and Mr. McCain at that time was the head. We had this mass meeting at the Grange hall and one or two people did sell a small amount of frontage and the rest didn't. And everybody in the area was claiming 60 feet at that time.

Q. You haven't anything from the State Roads Commission or any other written matter to say the road was 60 feet wide?

A. The only thing we did find and that was called the Old Road or Old Cumberland Road. This was the turnpike. They referred to Baltimore County and referred from Cumberland on and it states between Frederick and Cumberland the turn pike at that time was wide enough for four wagons abreast - or 60 feet.