

A. She had the property and the homeplace was on it.

Q. Was that ownership by Deed?

A. Yes.

Q. Would you identify this document which was Exhibit C of the original complaint.

A. That is correct.

Q. To the best of your knowledge, is the property that you are claiming, this 1-acre tract of land, the part of the land described in this Deed?

A. Yes.

Q. Would you tell us the basis for your claim to this property.

Q. After my father died we took care of the property.

Q. How did your father get the property?

A. Miss Matilda Lee gave him the piece of land. In fact, Mr. Joe Lee stated that the land would be given to him to build his home on.

Q. Now, I'd like to show you Exhibit B and ask if you can identify it.

A. That is a memorandum he gave my father for the piece of land.

Q. The memorandum is addressed to "Dear Fred." Can you tell us who that is.

A. Fred is my father, and it is signed by my Uncle Joe, Mr. Joseph Lee, Miss Matilda's son and Miss Gertrude's brother.

Q. At the time this letter was written, did Miss Matilda T. J. Lee still own the property?

A. Yes.

Q. This memorandum refers to a memorandum of gift. Do you know the whereabouts of that memorandum?

A. No, I don't.