

- A. Last summer was the last time.
- Q. Do you know who owns the property over which that right-of-way travels?
- A. No.
- Q. How about the property between where your farm is and Maryland Route 550? In other words from the point marked "Gate" to where your property is marked as Dairy Farm down to Route 550. Do you know who owns that property?
- A. I don't know whether that is the Marshall property or whether it has been sold off to James Harne to build a house. I don't know exactly.
- Q. Has anyone ever attempted to obstruct your family's access to the farm over that right-of-way?
- A. Yes, Mr. Goeller.
- Q. Mr. Goeller, is he the same Mr. Goeller who is named as respondent in this law suit?
- A. Yes.
- Q. Would you describe the methods by which Mr. Goeller has attempted to obstruct your access across the road?
- A. He put up a fence. Advertised in the wood lot that he owned it. He put up signs. And also advertised in the paper that he owned it.
- Q. Approximately when did this begin?
- A. My father and Mr. Tom Keeney died within the same year. As a matter of fact they died within a couple of months of each other. Then Mr. Remsburg owned the property, Dr. Miller owned it, and I think Mr. Goeller was the next man to buy it and he is the one who attempted to do this.
- Q. Did these attempts begin at about the time he bought the property?
- A. Yes.
- Q. Do you have any idea approximately what time that was?
- A. It was several years after Mr. Tom Keeney's death.
- Q. When was that?
- A. The same year as my father's death, 1961, because Daddy died in July and Mr. Tome Keeney and his wife both died on the same day the last part of August.
- Q. Regarding the property itself, not the right-of-way, has there ever been any dispute between your family and Mr. Goeller about the ownership of the property?
- A. Not between my father; no but it started after my father died when my mother was owner of the farm. Mr. and Mrs. Goeller came to Mother and said that my father had sold them land and they owned it.
- Q. At that time did your family dispute the fact that the Goellers owned the land?
- A. Yes.