

Q. Did you incur a charge for that work?

A. Oh, yes.

Q. When was the most recent bill?

A. In August of 1983, \$290.00.

Q. As you know, we have filed with the Bill of Complaint in this case a copy of a Deed showing record ownership in the property in the names of Isaac and Henrietta Thomas. Are you or have you ever been acquainted with Isaac and Henrietta Thomas?

A. I never knew my grandfather, but I did know my grandmother. He died probably before I was born. I never heard them talk about him.

Q. Henrietta Thomas your grandmother?

A. I did know her.

Q. Are those persons now deceased?

A. Yes, they are.

Q. To the best of your knowledge, when did your grandmother and grandfather pass away?

A. I don't know when he died, but she died in 1916.

Q. Did he predecease her?

A. Right before. I don't remember him at all.

Q. After your grandmother passed away, what relatives survived her?

A. Aunt Sarah Brown stayed on the property until 1918 when she died. Which is two years.

Q. What other relatives survived her, your grandmother?

A. Georgia Williams and Jane Thomas and Sarah Brown.

Q. I show you a copy of a deed dated September 12, 1878 in the name of Henrietta Thomas and Isaac Thomas, as Grantees, is this the property to which you are claiming title?

A. Yes that's right.

Q. Did any of your relatives live on this piece of property after your mother passed away?

A. Aunt Sarah Brown lived there until she died in 1918. Probably a year and some months, I don't know how long.

Q. Did there come a time when the property was abandoned by everyone except yourself?

A. Yes, it was.