

PAUL J. ZOERB and  
ETTA MAYE ZOERB, his wife

Vs.

SILAS P. RICE

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NO. 25,501 EQUITY

IN THE CIRCUIT COURT FOR

FREDERICK COUNTY, MARYLAND

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RESPONDENT'S ANSWERS TO INTERROGATORIES

The Respondent, Silas P. Rice, hereby answers under oath, in writing, in numerical sequence, the Interrogatories propounded to him in the above matter. These Answers are deemed continuing, and additional information will be furnished to counsel for the Complainant as the same becomes available to counsel for the Respondent.

1. State the names, addresses and current telephone numbers of all parties having knowledge of the facts relevant to the dispute between the parties in this case.

ANSWER: Nelson Rice, Route 1, Thurmont, Maryland, 898-9708; James Johnson, Waverly Garden Apartments, Frederick, Maryland, 662-7528; Joshua Rice, Route 3, Frederick, Maryland, 898-9741; Edward W. J. Harris, Route 1, Box 180A, Thurmont, Maryland, 898-7455; and my attorney.

2. State the names, addresses and current telephone numbers of all surveyors, engineers and/or other experts who have any knowledge or have looked into the boundary lines in dispute in the current case and attach copies of any surveys, diagrams, plats, etc., or reports made.

ANSWER: Edward W. J. Harris, Route 1, Box 180A, Thurmont, Maryland, 898-7455; Mr. Harris has not prepared any surveys, diagrams, plats or reports.

3. In your sworn Answer to the Bill of Complaint in this case you stated that "...the metes and bounds description of the Complainant's land prepared by the said Joseph F. Brown is incorrect"; please describe in detail the parts of this description that you claim are erroneous.

ANSWER: In 1948, an oral agreement was reached between the parties in this case, through their respective counsel at that time, as to the location of the property line in question in this case. At that time it was agreed that a "locust" tree would