1st
1. See the Deposition of Dr. Anderson Warfield on the part of the Complainant.
=He states that Sarah died in the year 1805 she was in the possession of the Complainant, say two years.
=Cannot state what Sarah was worth annually.
=States that Wile, when first in the possession of the Complainant was young that he is a bad fellow is frequently in the habit of absconding, and is at this time not worth more than $30 per Annum
=Jane at the date of the Mortgage and when first in the possession of the Complainant was not worth more than her victuals & cloathes
=States that Jane at present would hire for $24 per Annum
=John has been an expense to the Complainant of $12 or $15 annually, from the date of the Mortgage until within a year past since at this time is not worth more than his victuals & cloathes
=Horace from the time of the Mortgage has been and still is an expense to the Complainant of $12. or $15 Annually
=States that Tucker told him that the Mortgage was executed to secure the payment of the loan with Interest and that he Tucker would pay the Interest.
=That he Warfield has frequently heard Tucker say, that he expected the services of the negroes was equivalent to the Interest on the loan, and that he should ~~claim~~ only claim the Interest and would pay the Principal.
2nd See the Deposition of Francis Bolman on the part of the Complainant.
=He states that Wile one of the negroes is a fellow of such bad character and of so little service, that he would not give $20 per Annum for him
=That Jane for the first four years was not worth more than her victuals & cloathes
=That Horace and John has been an expense to the Complainant.

3rd See the Deposition of Wm D. Clemmen on the part of the Complainant
=He states that John for the two last years clear of his cloathes found and Apprentment pair was worth $5 per Annum
Horace has been, still is an expense to the Complainant
=4th See the Deposition of Benjamin Gaither on the part of the Complainant
=He States that Wile is a fellow of bad character and has been of little use to the Complainant.
=1st See the Deposition of Joshua L. Higgins on the part of the Defendant
=He states that if he wanted to hire he would have given $20 per Annum for Sarah, twenty dollars in the year 1804 for Wile and at present would give $50 per Annum for Wile. Jane when first in the possession of the Complainant was not worth more than her victuals & cloathes, at this time he would give for her $24 per Annum. John has been an expense to the Complainant, until within a year past, knows nothing about Horace.
=Recollects that there was a Contract between the parties and that the labour of the negroes was to be considered an equivalent for the Interest of the Money.
=2nd See the Deposition of Ladock Wales on the part of the Defdt
=He states that John has been an expense to the Complainant until now, Horace has been and still is an expense.
=3rd See the Deposition of George W. Higgins on the part of the Defdt
=He states that there was a dispute between the parties respecting the Contract that Joshua L. Higgins & Richard Waters were chosen by the parties to settle the dispute, that they determined the labour of the negroes was equivalent to the Interest on the loan.

17898-2