and says
To the first interrogatory that She does know the parties Mrs Watkins the complainant is deponents mother. She has known the defendant since she was a child.
To the second interrogatory, that deponent is acquainted with the character and habits of the defendant Watkins. His habits are bad. He is very dissipated He is not at all industrious but on the contrary very lazy. He is quarelsome and habitually a drunkard, and deponent thinks his habit of drunkenness are increasing upon him. He has not a good standing in the neighborhood. Deponent has lived in the house with him ever since he married her mother.
To the third interrogatory, deponent thinks that his treatment to Mrs Watkins since their marriage has been cruel and unkind. He threatened her several times and does not think that he has treated her as a husband should treat his wife. On one occasion he threatened to smack her jaws. She saw him shake his fist in her face. On another occasion he threatened to push her out of doors, when she had to leave the house to get rid of his abuse. Deponent has seen him whilst he has been abusing her take his gun down and walk about the house with it in his hand. On all these occasions he was drunk. It was his habit to get drunk. He would curse and abuse her and call her ill names, whenever she spoke to him about remaining at home and attending to his business. She does not recollect any other occasions when he threatened her.
The fourth interrogatory waived.
To the fifth interrogatory, that She does not know how defendant has managed the farm, except that he has managed it badly. He never made more

than half a crop, and let the servants do as they please. He was not attentive on the farm, but was always away from home. He does not think that he made as much as he ought to have made, and thinks that a good manager might have made about as much again.
To the sixth interrogatory, that defendant has no other property than that derived from his marriage with the complainant that deponent has any knowledge of and is engaged in no business which brings him in any thing.
To the seventh interrogatory, that she knows that defendant dealt with Samuel Bird and contracted an account with him of sixty dollars for which the complainant gave her note.
To the eighth interrogatory, that Mrs Watkins lives at Taylorsville, and the defendant continues at the old place. She moved there about a week ago.
To the ninth interrogatory, that Mrs Watkins has a life estate in sixty five acres of land. She has also horses, and other stock, and three negroes. All of the personal property remains on the farm. She has no other means of support than that derived from said property. The farm has lessened in value since his marriage and in consequence of his not putting any improvements upon it, and not staying home and attending to have it worked. Deponent does not think that as it is at present worked, it yields a support, but if properly managed it would support her and her family.
And thereupon the defendants solicitor propounded the cross-interrogatories filed as aforesaid to which she answers
To the first cross-interrogatory, that She was opposed to the defendants marriage with her mother Mrs Watkins.
To the second cross-interrogatory, that very good crops were made before her mothers marriage with Watkins