

same referred to in the mortgages now exhibited to you Lastly
 Do you know or have you heard of any other matter or thing
 that would tend to the benefit or advantage of the
 Complainant in this Cause if you state the same fully
 Wm. D. Ross Solicitor for
 Complainant

At the execution of the enclosed Commission issued out of the Circuit
 Court for Frederick County sitting as a Court of Equity to me
 directed & empowering me to examine evidence in a cause pen-
 ding in said Court between Joseph Hays as Complainant and John
 Manson & others as defendants being No 2773 on the Equity docket of
 said Court I Grayson Eschbacher the standing Commissioner duly
 qualified did proceed to take the following depositions at my
 law office in Frederick on Friday the 11th day of March 1859 to wit
 David Lamb a witness of lawful age produced on the part
 of the Complainant being duly sworn & examined to interrogatories
 filed with me by the Complainant's Solicitor & herewith returned
 deposes and says. In the first Interrogatory I know Joseph Hays
 the Complainant John Manson Jane Cord James Thomas & Deborah
 his wife William Hays Samuel E. Hays & James J. Hays defendants
 In the second Interrogatory I did know John Armstrong deceased
 he died fifteen or sixteen years ago I think he left a son named
 James who is since dead but whether with or without children
 I don't know a daughter Elizabeth named to Thomas Hays both
 of whom are dead leaving the following children Deborah wife of
 Dennis Thomas Wm Hays Eva Samuel E. Hays who resides out of
 this State Joseph Hays & James J. Hays who resides in Frederick
 County were granted to John Manson who is since dead leaving
 the said son residing in Indiana I am married to Samuel Cord
 who is now dead resides in Pennsylvania & Mary married to Dr-
 riding Menomy resides in Virginia - They are all over 21 years of age
 In the third Interrogatory I do know the handwriting of John Armstrong
 I look at the papers now shown me marked A No 1 B No 1 + 6 No 1 the
 signatures therein are the handwriting of John Armstrong In the fourth
 Interrogatory I do know the handwriting of Thomas Hays I look at the
 said paper A No 1 now shown me the attestation of said note is the
 handwriting of Thomas Hays In the fifth Interrogatory I do not
 In the sixth Interrogatory I do know James London the note
 for \$300 was for money loaned to buy the lot & put up the house
 specified in the mortgages in this Case - the said notes are the notes
 set forth in the said mortgages In the seventh Interrogatory I do not
 The Solicitor filed with me the three notes marked A No 1 B No 1 + 6
 No 1 the papers marked A No 2 B No 3 C No 3 & Exhibit D they are
 herewith returned there being no further testimony & no further
 time being desired I closed the said Commission & herewith return
 the same I closed under my hand seal the 11th day of March 1859 -
 Grayson Eschbacher Esq
 Commissioner