

- state their place of residence and whether they are of lawful age or not.
- 2^d Int- Were you or not acquainted with a certain Rosanna Flanagan wife of the complainant in this cause. Is she dead or alive? If dead when and where did she die?
- 3^d Int- Did or did not the said Rosanna Flanagan leave children living at the time. If you name them and state their ages, sexes and places of residence whether married or single, if married to whom they or either of them are married.
- 4th Int- Was or was not the said Rosanna Flanagan a widow at and prior to the time of her marriage with the complainant. If you state the name of her former husband, the time of his death, and the names of her children by him if any, and whether they are living or dead and the time of their death.
- 5th Int- Have or have not any of the children of the said Rosanna by either husband, died since the making of the deed of trust, a certified copy of which is marked exhibit "I. F. No. 2" filed in this cause and it is now here shown to you, dated 10th May 1849, and before the death of the said Rosanna. If you state their names, whether married or single, whether they left children, and whether they left widows & whether said widows or either of them have since married and to whom?
- 6th Int- Were you or were you not acquainted with a certain Patrick O'Neil, the trustee named in the deed of trust, shown you under the last interrogatory? If you, is he living or dead. If dead, when and where did he die, and who was his heir at law, or what child or children did he leave. If any state name age and residence.
- 7th Int- Did or did not the said Patrick O'Neil assume and execute in his life time the duties of the trust mentioned in the said deed of trust heretofore shown you over the said property therein mentioned? And since his death, has the heir at law attempted to perform any of said duties.
- 8th Int- State all your knowledge of any matter or thing relating to the subject of these interrogatories, or the subject-matter in issue in this cause, that may be material thereto.

James McSherry

Solicitor for Complainant

At the execution of the annexed commission issued out of the Circuit Court for Frederick County and to me directed and empowering me to examine witnesses on the cause depending in the said Court between Thomas Flanagan as Complainant and John Oates & Mary Oates and others as Defendants. I William B. Nelson Commissioner therein named, having taken the Oath annexed to said Commission, and having appointed Thomas W. Holtzman, my Clerk and having administered to him the oath annexed to said commission to be taken by him and on the twenty first day of May A.D. 1862 at my law office in Frederick City Maryland proceed then and there in the presence of Solicitor for Complainant take the following depositions to wit:

Michaelth Farrell, a witness of lawful age produced on the part of complainant being duly sworn and examined to interrogatories filed with the commission by the Complainant and herewith returned, deposes and says:

To the 1st Interrogatory, says I am acquainted with all the parties of the suit - I except that I have known all the parties above-mentioned years, all the parties live in Frederick except - W. O'Neil who I believe lives in Baltimore City.