Interrogatories

Randolph Dudrear assignee of Geo Wachter vs Jacob H Staley

No. 3481 Equity ~

In the Circuit Court for Frederick County. ~

Interrogatories to be propounded to witnesses to be produced on the part of the Complainants

1st Int. ~ Do you know the parties to this suit? and if you, how long have you known them, and where do they reside? ~

2nd Int. ~ Were you possessed of the real Estate mentioned and described in Exhibits Nos. 1 & 2. filed in this Case, and are you the Grantee named in the deeds of which said Exhibits are Copies? ~

3rd Were you the owner of said real Estate in or about the 1st day of April 1865, and if so, did you then enter into any agreement with the defendant, Jacob H Staley for the sale to him of said real estate? ~

4th Int. If your answer to the third interrogatory, is yes, then was said agreement in writing? And if not, then state particularly what the same was, giving its date, terms, and how far the same was performed, and if said agreement was in writing then produce the same?

5th Int. ~ Did the said Jacob H Staley take possession of said real estate under said agreement? And has he since occupied the same, and did he pay you any money in said purchase, and how much? And if he did not pay you the whole of the purchase money, did he give you any written obligation for the balance? ~

6th Int. Look at Exhibits Nos. 3 & 4 filed in this Case, and state whether they are the Bonds or written obligations, given you by said Jacob H Staley for the balance of the purchase money on said land, and state whether they have been paid or any part of them, other than the Credits entered on them? ~

7th Int. ~ State clearly and particularly how much is still due and unpaid of said purchase money, and how much of the same was due you on the 9th day of August 1868? ~

8th Int. ~ State whether you did on said 9th day of August assign said bonds or notes to the Complainant, Randolph Dudrear, and did you at the same time and place assign to said Randolph Dudrear your Vendor's lien upon said real Estate for the payment of said notes? ~

9th Int. ~ Did you receive full value from said Randolph Dudrear for said notes and lien, and state fully all your knowledge herein? ~

10th Int. Look at the signature to the assignment on the back of said notes or bonds, and state whether the same are your signatures? ~

11th Int. Are the signatures to said notes or bonds in the handwriting of said Jacob H Staley? ~

12th Do you know anything further that would be of benefit to the Complainant in this Cause? If so, state all you know as fully and particularly as specially interrogated thereto?

Interrogatories to Randolph Dudrear ~

1st Int. ~ Are you the Complainant in this cause, and do you know the real Estate mentioned and described in Exhibits 1 & 2?

2nd Int. ~ What is your Estimate of the value of said real estate? give particularly your knowledge herein, and also state what it was worth in April 1865. ~