

No 3573 Equity ~

Interrogatories

William Graham  
George Kuhn, Napoleo  
Kuhn, Peter Kuhn  
Jacob Kuhn Frank  
Kuhn, Jacob Hunter &  
Elizabeth Hunter his wife  
And Harriet Kuhn

In the Circuit Court for Frederick County in Equity

Interrogatories to be proposed to witnesses to be produced on the part of the Complainant ~

1<sup>st</sup> Sub. Are you or not acquainted with the parties to this suit, or either, and which of them? If yes, how long have you known them or either of them? ~

2<sup>nd</sup> Sub. Were you or not acquainted with the hand writing of a certain William Kuhn? If yes, look at the paper now shown you marked Exhibit No 1 - Is or is not the signature thereunto attached in the hand writing of the said William Kuhn, If yes, state all your knowledge hereon ~

3<sup>rd</sup> Sub. Were you or not acquainted with a certain William Kuhn formerly a resident of Frederick County? If yes, is he dead or alive? If dead, when and where did he die? ~

4<sup>th</sup> Sub. Was or was not the said William Kuhn married at the time of his death ~ And did or did not the said Wm. Kuhn leave children? ~

5<sup>th</sup> Sub. Did or did not the said William Kuhn leave Brothers and Sisters and descendants of deceased Brothers him surviving? If yes, state their names, ages and present places of residence? State all your knowledge hereon ~

6<sup>th</sup> Sub. Do you or not know the real estate owned by William Kuhn in his life time? If yes look at Exhibits No 2 and No 3, now shown you, Do those deeds embrace the real estate of said William Kuhn? State where situate, and was he or not in possession thereof, and when. ~

7<sup>th</sup> Sub. Are you a Justice of the Peace for Frederick County? If yes, look at the Mortgage now shown you, Did or did not Wm. Kuhn, now deceased, execute said Mortgage before 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 yes, state the same fully ~

Wm. Ross  
Chas. W. Ross  
Solicitors for Complainant

Filed March 20<sup>th</sup> 1871 ~

Testimony

At the execution of the annexed Commission as sent out of the Circuit Court for Frederick County, and to us directed, and empowering us to examine Witnesses in the cause depending in the said Court, between William Graham as Complainant and George Kuhn, Harriet Kuhn, and others, as Defendants. ~ The Francis Brouge and John E. R. Wood, Commissioners therein named, did on the 20<sup>th</sup> day of February, in the year 1871, at our Offices in Frederick City, Md., proceed to take the following testimony, in the presence of Complainant's Solicitors. ~

John Short, a witness of lawful age, produced on the part of the Complainant, being duly sworn and examined to Interrogatories filed with the Commissioners by the Complainant's Solicitors, and herewith returned, deposes and says. ~

To the 1<sup>st</sup> Sub. I have known the parties for many years. ~