

Sarah A Geesey
Mary D Geesey
Matilda Geesey

No 3692 Equity ~

In the Circuit Court for Frederick County, in Equity ~

Interrogatories to be propounded to John B Stimmel and Jesse Gueselman witnesses produced upon the part of the Complainant ~

1st Sub. Do you know the parties to this suit? If yes, how long have you known them?

2nd Sub. Did you know William H Geesey in his lifetime?

3rd Sub. Is said William H Geesey living or dead? If dead, when did he die?

4th Sub. Did he leave a widow and children? If yes, name them, and state if said child is an infant under twenty one years of age?

5th Sub. Did you about the year 1867, act as Agent of Complainant Sarah A. Geesey, in the purchase of the real estate described in Exhibit B to Bill of Complaint? If yes, state what you did in pursuance of said Agency.

6th Sub. State why the said real estate was deeded by the grantors therein to William H. Geesey.

7th Sub. Do you know of any bargain or agreement between Sarah A. Geesey and said William H. Geesey relative to said real estate? If yes, state all your knowledge on the subject.

8th Sub. Has any deed been made of the said property agreed to be conveyed by said W. H. Geesey to Sarah A. Geesey, by any one to said Sarah A. Geesey?

Frederick J. Nelson

Sol for Complainant

Filed Dec 19th 1871 ~

Testimony

At the execution of the annexed Commission issued out of the Circuit Court for Frederick County, sitting as a Court of Equity, and to us directed, and empowering us to examine Evidence in the cause depending in the said Court, between Sarah A Geesey and Matilda Geesey as Defendants - We William B Nelson and J. E. R. Wood, Commissioners therein named, having met at our Office in Frederick City Maryland on Saturday the ninth day of December A.D. 1871, pursuant to previous notice thereof given to the said parties did proceed then and there to take the following evidence, to wit: -

The Complainant filed with the Commissioners as evidence Exhibits A & B. The Commissioners then proceeded to take the following depositions, to wit:

Jesse Gueselman, a witness of lawful age, produced on the part of the Complainants, being duly sworn and examined to interrogatories filed with the Commissioners by the Complainants and herewith returned deposes and says. ~

To the 1st Sub. ~ I know the parties to this suit, have known the Complainant for a long time, and the Defendants for four or five years. ~

To the 2nd Sub. ~ I did ~

To the 3rd Sub. ~ He is dead, he died in January A.D. 1868. ~

To the 4th Sub. ~ He left a widow and child, the Defendants in this cause. The child is an infant under twenty one years of age. ~

To the 5th Sub. ~ I did act as Agent of Sarah A. Geesey in the purchase of the real estate described in Exhibit B to the Bill of Complaint. ~

It was in the year A.D. 1863. In pursuance of said Agency I went to John B Stimmel to purchase the property described in Exhibit B, for Sarah A. Geesey Complainant, and purchased the same for her and paid Three Hundred and Seventy five dollars for the same. ~

To the 6th Sub. William H Geesey was the owner of certain real estate described

Order Com to take of Depo

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