

1st Int. What is your name, age, place of residence and occupation?

Ans. John L. Potter, aged forty two years, reside in New Market District & am a Farmer.

2^d Int. Are you acquainted with the Parties to this suit or either of them? If yes, how long have you known them and each of them?

Ans. I have known all the Parties for many years. I saw one of the Complainants

3^d Int. Look at the Maps now shown you, and state whether you are acquainted with the land in controversy in this suit? If yes, state whether the said land is susceptible of any advantageous division between the Complainants & Defendants? give your reasons for the Opinion fully?

Ans. I look at Exhibits Nos. 1, 2, 3, 4 & 5, now here shown me & know the lands, I think a Division would be advantageous to all Parties. Two farms will bring more money than one.

4th Int. Can said land be divided without loss and injury to the Parties interested? State fully herein?

Ans. I think they can, the way it stands, it is a disadvantage to both. Its present condition and no improvements put on it, it is going down every moment. I have put up about seven thousand rails and a Corn House and Tenant House on the East Part. I have put more on the Eastern part of the land than on any other part. I am not willing to put any further improvements on it for other people, until I have seen to get the benefit of it. I think if divided, two farms will bring more than one. I offered to divide it with him by an East and west line or by a North and South line or to sell it to him, but he refused to either divide or sell.

To keep Interrogatories filed with the Commissioner by the Defendants and herewith returned the said John L. Potter deposes and says to the

1st Corp Int. Describe each of the dwelling houses of which you have spoken? What is the size of the New House, What is the size of the Old House?

Ans. The Tenant House is about twenty four feet by eighteen feet. The home House is about twenty four feet by twenty feet, with a round log Kitchen twenty feet by eighteen feet, with the bark on the logs, built probably in the year sixteen Hundred and seventy five. It was the first House built on the property after it was taken up. I am only telling what George Conroy Col^d, said,

Excepted to by the Complainants.

2^d Corp Int. In speaking of an advantageous Division of the Property, have you your mind fixed upon certain definite plan of dividing the same. Describe it;

Ans. I have not.

3^d Corp Int. Are you thoroughly acquainted with the character of the entire land?

Ans. I think so.