the time of the writing and execution of the said Mortgage or in the procurement of the same and if yea who was it and state all conversations you had with him out of the presence of said Stoner if you had any, with reference to said Mortgage and state all representations made by him if any with reference thereto.

6th. Do you know Mary Bankerd one of the Defendants in this case, and if yea state her age and state of health.

7th. Do you know the Real Estate described in said Exhibit No. 2, and if yea, state the quantity and quality of the Land and the value of the same.

8th. Do you know anything further that would be of service to the Defendants in this case and if yea state the same fully

Milton G. Urner
Solr for Defts

Filed Oct. 29. 1874

Cross-Interrogatories

Cross-Interrogatories propounded to W. R. Curry a witness for Complainant in No. 3901 Equity.

1st. You have stated in your answer to Compltts. 3rd Interrogatory, there is no other visible property of Mary Bankerd, and she told you she had no property, please state what you mean by there being no other visible property, and state fully the occasion upon which Mary Bankerd told you what you have testified to, and all she said, and how she came to say what you have testified to.

2nd What is the age of Mary Bankerd.

3rd. What is the value of the interest conveyed by the Mortgage of which Exhibit No. 2 is a copy.

4th. How close do you live to said farm, and have you ever lived closer than you do now.

5th. Where was the said Mortgage executed, and at whose request was the same executed.

6th Was the Mortgage executed at the time you refer to in the Ans to the last Int. and if not, how long afterwards

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Solr for Defts.

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Testimony

At the execution of the annexed Commission issued out of the Circuit Court for Frederick County and to me directed and empowering me to take evidence in the cause therein depending between Upton Stoner as Complainant and Mary Bankerd & others as Defendants. I, William B. Nelson Commissioner therein named did on the 7th day of May 1874 at my Office in Frederick City, Maryland, in the presence of of the Solicitors for the Complainant and Defendants then and there proceed to take the following depositions, to wit.

Complainants Testimony

William R. Curry, a witness of lawful age produced upon the part of the Complainants being duly sworn and examined to Interrogatories filed with the Commissioner by the Complainant and herewith returned deposes and says, to the

1st Int. Do you know the parties to this suit, and how long have you known them.

Ans. I do. for a number of years

To 2nd Int. I know the hand-writing of the Complainant, and of ~~Jacob~~ Bankerd