

Ruth Grove)

Samuel Todd, a witness of lawful age, produced on behalf of the complainants by me first duly sworn on the Oath of Almighty God, being examined on the following interrogatories to him, performed in behalf of said Oath deposed and saith as follows, that is to say:

Q¹st. What state show name age place of residence and your occupation?

Answer. My name is Samuel Todd, I will be sixty seven years of age on the 18th day of December next, I reside in Frederick County Maryland, my occupation is farming.

Q²d Inter. Are you acquainted with the Parties to this cause, and which and how many of them; and how long have you known them respectively?

Answer. I am acquainted with all the Parties Complainants and Defendants, I have known the Children ever since they were born, I have known Samuel Grove for several years, and his wife since her marriage in 1866.

Q³d Inter. Did you know Benjamin Todd on his life time, if yea, how long did you know him?

Answer. I knew Benjamin Todd, ever since I can remember, he was my brother.

Q⁴d Inter. Where did you reside, during the whole of the year 1866, and where did said Benjamin Todd then reside; and how far distant were your Residences from each other; and during the said year 1866 did you or not frequently see and converse with said Benjamin, and if yea how frequently?

Answer. I resided near Farm No. 4, on the Baltimore & Chis. Road in 1866, where I now reside. Benjamin Todd resided in Frederick County Maryland, in the Year 1866, until September of that year when he returned to Ridgeville, in Carroll County where he died - after Benjamin's removal to Carroll County his residence was about one and a half or two miles distant from mine. During that year I do not think I often passed a week without seeing him, I sometimes saw him twice a week, and on such occasions, conversed with him.

Q⁵d Inter. Do you know whether Vashel D. Todd one of the Defendants in this cause resided with the said Benjamin Todd during the said year 1866, and if yea what part of said year, and for how long a time?

Ans. I misremember at what particular time Vashel D. Todd came from Illinois, but think it was the last of September or first of October of that year he resided with Benjamin Todd from that time until the 30th of December following when Benjamin died.

Q⁶d Inter. Did any of the members of Vashel D. Todd's family come with him to Maryland and if yea where did they reside during Vashel's stay in Maryland?

Answer. Yes his wife and daughter and his Granddaughter came with him, they resided with Benjamin Todd while he remained there.

Q⁷d Inter. Did you see and converse with Vashel D. Todd while he resided with Benjamin Todd, and if yea, did you ever hear any thing said by Vashel in regard to