

I state what amount, as near as you can say?

Answer: In eighteen hundred & fifty two (1852) to my knowledge I don't think he was in debt much. I might say five thousand Dollars (\$5000) but in eighteen hundred & sixty two, to my knowledge he was in debt to the amount of fifteen thousand dollars (\$15000)

21<sup>st</sup> Interrogatory: What was Col. Thomas Hammond's financial standing in the community in which he lived in 1852 & 1862 and what was his personal credit?

Answer: Very good. He could borrow on his credit just as much money as he wanted. He could have borrowed forty thousand Dollars (\$40,000) in eighteen hundred and fifty two (1852). In eighteen hundred & sixty two (1862) he could not have done it but he could have borrowed on his own personal security, twenty thousand dollars (\$20,000) at least.

22<sup>d</sup> Interrogatory: From all your knowledge of Col. Thomas Hammond's Estate, personal & real and of his business transactions in the year 1852, how much in value of his estate, in your judgment, could he have withdrawn from his Estate without any Detriment to the claims of his creditors then existing?

Answer: According to my impression he could have disposed of twenty thousand Dollars (\$20,000) worth and had left an abundance to satisfy all his creditors.

23<sup>d</sup> Interrogatory: - From all your knowledge of Col. Thomas Hammond's estate, personal & real and of his business transactions in the year 1862, how much in value of his estate, in your judgment, could he have withdrawn from his estate without any detriment to the claims of his creditors then existing?

Answer: So far as my knowledge extends in regard to his business he could have disposed of eleven or twelve thousand dollars (\$11,000 or \$12,000) worth of his property and have had sufficient left to satisfy all of his creditors. That is my impression.

To Lewis, Interrogatories filed with the Commission by the complainants and herewith returned. The said Ephraim Richmond deposed and says to the 1<sup>st</sup> Q. Interrogatory: In the years 1852 & 1862 was not Col. Hammond often pressed by his creditors?

Answer: In eighteen hundred & sixty two (1862) he was, but not in eighteen hundred & fifty two (1852)

2<sup>d</sup> Q. Interrogatory: Was not Col. Hammond a man that was always short of cash always pressed for money, and always endeavoring to raise money in some way, or other?

Answer: For the last ten (10) years of his life he was heavily pressed and suffered himself to be arrested and arraigned. That I know because I was on some of his paper myself.

3<sup>d</sup> Q. Interrogatory: Have you any knowledge of the actual amount of Col. Hammond's indebtedness in 1852 & 1862?

Answer: I have not.