

No. 3972 Equity

To Cross Interrogatories filed with the Commissioner by the Defendants & herewith returned, the said George H. Padonour deposes & says, to the

Testimony of
Geo. H. Padonour

1st Q. Int: (You state, in your examination-in-chief, that the mare & colt, spoken of by you, got into Pennsylvania. Will you testify this from your own knowledge, or merely from what you have heard from others?

Ans: I just heard from others, that the mare in Pennsylvania, that's all.

2nd Q. Int: - How many children did Simon Miller leave surviving him?

Ans: - I don't know, I never kept an account - I've been in the house a couple of hundred times & I don't know how many.

3rd Q. Int: - How many of his children, do you know, and what are their names?

Ans: I know the oldest one they called "Liss" I know Caroline - then there's one they call "Bama" & I know John. There was a couple more, whose names I don't know, I never gave any attention to it.

4th Q. Int: - What was the value of the colt when Simon P. Miller died, & how long did Jacob Miller have him?

Ans: - About 25¢ - I think Jacob Miller had him a year.

George W. Ambrose, a witness of lawful age, produced upon the part of the Complainant, being duly sworn & examined to Interrogatories filed with the Commissioner by the Complainant & herewith returned, deposes and says to the

Testimony of
Geo. W. Ambrose

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

Ans: - I have known the parties for about 12 years.

2d Int: - Look at paper marked "Exhibit A," and say whose name is signed to the same?

Ans: - I look at "Exhibit A," now here shown me. Simon Miller's name is signed to it. I don't know his handwriting.

3d Int: - Did you ever have any conversation with Simon Miller, in his life time, in regard to a mortgage to Jacob Miller? If yes, when and what was said?

Ans: - I had not.

4th Int: - What horses did Simon Miller own in March 1872?

Ans: - Well, what I called a black mare, a brown mare, & a yearling colt.

5th Int: - How long had he had these horses?

Ans: - I had known him to have them for several years up to that time and he had none other that I know of.

6th Int: - Did these same horses remain on his place at the time of his death, and now others?

Ans: - Yes sir.

7th Int: - Are these horses on Simon Miller's place now?

Ans: - No sir.

8th Int: - When did they disappear from there?

Ans: - One came away on or about March 8th 1873 & one on the 18th March 1873

Testimony of
Geo. W. Ambrose