

No 6418. Equity

Q1

I don't know of anything more
Merrill Young.

(1 day 4 miles)
Albert John Keys, a witness of lawful age produced
on the part of the plaintiffs being duly sworn
deposes and says as follows:-

Q2

State your name age & residence & relations
to the parties to this case:-

Ans

John Albert Keys. I am 38 years of age.
I reside near Urbana this County. I am one of
the defendants and the husband of Georgia Keys
a daughter of Sarah Fretzmann who died in
1893 intestate.

(It is admitted and the Examiner is directed to
note that the heirs at law ~~of~~ age and residences
are correctly stated in the testimony of Georgia Keys
& no further testimony is required need offered
on that point so far as Counsel are at present
informed)

Q3

At the time of the death of Sarah Fretzmann
was she in possession of any real estate in this
County & if yes, describe it:-

Ans

She had 1/2 acre of land one mile East
of Urbana this County described in the Bill of
Complaint in this Case. 2 acres in the lot
in dispute and 2 acres across the road
from the lot first mentioned, the last 2 acres
has nothing to do with this case.

Q4

Did the said Sarah Fretzmann place
any place any improvements on the land in
dispute in her lifetime & if yes state what they
were and who paid for them:-

Ans

She remodelled the house, dug a well & put
a pump and stock in it. She paid for it as
far as I know.

Q5

Is said land susceptible of division amongst
the heirs at law without loss, damage & injury to
them?

Ans

No: Sir - it could not be divided without
loss, damage and injury.

Do you believe it to be to the best interests
& advantage of the parties interested in said land
to have the same sold and the proceeds divided
amongst them?

Ans

I do Sir:-

State if you know from whom this land
was purchased? (Excepted to)