

No. 8037. Equity.

When did your father die, and in 1874.

What heirs at law did he leave. Answer, myself, Richard Neaton, Reg. N. Neaton Philip Henry Neaton, and Sarah Jane Neaton, who is married to John N. Williams and they reside in Loudon Co. Va. except Geo. W. Neaton, who lives in Washington D. C. and his wife lives in the District of Columbia. Her name is Julia E. Neaton. Philip Henry Neaton died in about 1872. He left surviving issue the following children, one adult son, John Neaton whose wife's name is Edo and three, three adult daughters, Mary Neaton whose husband's name is John Joseph and of whom are now residents of Maryland and whose last known address was Frederick Hill, in Maryland and one adult son, Philip N. Neaton Jr, whose wife's name is Julia Neaton and who is now resident of Maryland. And whose last known address was Guyton, Md. It is unknown to me within the said children of my brother Philip N. Neaton, are living or dead & do not know whether they or either of them if dead left surviving any children or child.

ans.

Did John Neaton die, die seized and possessed of any real estate in Prince Geo. Co. Va. if you do not, it is not mentioned in these proceedings which is fully described in Exhibit no. 3. which is a certified copy of a deed for the said.

ans.

To whom was that land devised by the will of your father? A part of the devise of that land of my father's will which made an act follows. I give and bequeath unto my son Geo. Washington Neaton, and my daughter, Sarah Jane Neaton, to be equalled divided between them, the balance of my real estate, wherever it may be found.

ans.

Since the death of your father how has track of land been found? By my brother George Washington Neaton and my sister Sarah Jane Neaton, who are both now residing in Washington D. C. and who have been found in the said land in the County of Loudon, Va. and the same was duly notified and confirmed by the Circuit Court for Loudon County, Va. Equity in No. 8037 Equity docket in said Court. The deed to me is found filed at No. 38.

ans.

Who is John L. Cook one of the defendants in these proceedings, and where does he live? He is the mortgagee of Sarah Jane and John N. Williams, and is the trustee of the land mentioned in the proceedings, or appears by Exhibit 2. to the said of Campbell Co. Va. a resident of Loudon County Va.

ans.

Look at Exhibit No. 1 and state what it is? It is a deed from my father to my father John Neaton, or a certified copy of the deed for the property mentioned in these proceedings and correctly describes the same.

Who is Matilda A. Neaton, one of the defendants, she is my wife. To the best of my knowledge and belief more at this time Richard Neaton.

No other witnesses being named or produced before me, I take at the request of the petitioner for the Plaintiff, the depositions to be taken by me and now return, the same, signed by the several deponents, and also the several Exhibits filed as evidence to your Honorable Court at the City of Alexandria, of Loudon County, Maryland, this 19th day of July 1907. Witness my hand and seal at Princeton Buckey, Md. Examiner.

Receipts of taking the depositions: D. Princeton Buckey, Examiner \$4.00 Burr T. Tiley, witness & mileage 2.25 Gordon C. Hall " " 2.25 \$8.50

I hereby certify that the above Oaths are correct D. Princeton Buckey, Examiner

Petition of Sarah J. Williams et al. for leave to answer or plead to the Bill of Complaint Filed August 6-1907

To the Honorable the Judge of said Court, The Petitioner of Sarah Jane Williams et al. defendants in the above entitled cause respectfully represents unto your Honor: 1. That their attorney, Mr. Glenn W. Woodington, returned his appearance for them in the above entitled cause, and desired to file an answer or plea to the bill of Complaint in behalf of their petitioners setting forth as the petition a good defense to said bill as well as to the form thereof, but that their said attorney has not been in good health for some months past and has been out of town at a health resort, to recuperate, having just returned to his office to resume his duties. 2. That your petitioners, defendants as aforesaid, are all now residents of the State of Maryland and that notwithstanding the inability of their attorney to give the case prompt attention by reason of his ill health, and the heat of the summer, the Plaintiff through her attorney, without notice the petitioner for the Petitioner, obtained an order for process against their petitioners and proceeded to take testimony upon which certain bills have been returned to your Honorable Court and is now filed in the case but is not yet served. 3. That a case has been docketed in your Honorable Court, being No. 8165. Equity, by your petitioners affecting the same real estate mentioned in their proceedings and praying for a partition of the same in kind which case is still then and pending in said Court. 4. That if said cause proceed ex parte to a decree for a sale