

No. 9989. Equity,

Pro-confesso, against the Defendant, Mabel I, Grimes, but because it doth not certainly appear, to what relief the Plaintiffs are entitled, it is further ordered, that one of the examiners of this Court, to take Testimony to support the allegations of the Bill.

Hammond Urner,

TESTIMONY

William G, Grimes et al.,	(No. 9989 Equity,
)	In the Circuit Court for Frederick
Vs,)	County, In Equity,
William G, Grimes, Mortgagee,)	
et al.,)	

To the Honorable Judges of Said Court,;-

The above Cause being at issue, and notice having been given by the Solicitor for the plaintiff of a desire to take testimony in said Cause, leave of the Court having been first had, and obtained, I, D, Princeton Buckey, one of the standing examiners of the Circuit Court for Frederick County, Maryland, duly appointed, qualified and sworn met at my la office, in Frederick City, Maryland, on thursday the 18th, day of September, 1919, at the Hour of Ten O'Clock A.M. and then and there proceeded to take the Following depositions, that is to Say;-

Present-- A.D. Willard, esquire,
Solicitor for Plaintiffs,
and the Witnesses,

(there are Nine exhibits filed, as evidence, that are returned herewith to your Honorable Court)

J, Hayes Grimes, a witness of Lawful age produced on the Part of the Plaintiffs, having been first duly sworn, deposes and say as follows;-

My Name is J, Hayes Grimes, I reside Near Key-Mar. Frederick County, Maryland, and i am a son of william B, Grimes, and annie L, Grimes, my Father, died intestate, on or about December 7th- 1913, Avning real estate situated in Frederick county, Maryland, mentioned in the Bill of Complaint, as follows,

First a Tract of unimproved land, containing 50 acres and Eight Square perches of land, more or less, and known as "The Bear Farm" I look at Exhibit A, now shown me, and it correctly describes said Tract of land,

Second. A part of the tract of land known as the home farm, and containing 3 roods and 17-perches of land, more or less, I look at Exhibit B, now shown me, and it is the deed, from John A Keons, and wife to my Father for said land and it correctly describes the same, a part of the Bract of land Known as he said home farm, containing Five acres two roods and 28 perches of land more or less, I look at Exhibit B, now shown me, which is a deed from Frederick Crum, and wife to my Father, and dated June 1st 1874, and it correctly describes the said parcel of land,

Fourth- A part of the tract of land, known as the Home farm containing 24 Acres, and 13 square perches of land, more or less, I look At Exhibit D, which is now shown me, which is a deed from John Birely and wife, and others to my father, and datd march 29th- 1884, and it correctly describes said parcel of land,

My Mother, Annie l, Grimes, died intestate, on or about March 14th, 1919, seized of certain other real estate, mentioned in the Bill of Complaint, in this cause situated, in said Frederick County, Maryland As follows;-

First- A tract of land improved, Known as the Reuben Bohn Farm, containing 4 in the aggregate, 56 acres 1 rood and 8 square perches, of land more or less, I look at Exhibit E, now shown me which is a deed from Reuben Bohn, and wife to my mother, Annie L, Grimes and it correctly describes said tract of land,

Second- A part of the tract of land Known as the home farm Containing 21 Acres and 22 square perches, of land, more or less, I look at Exhibit F. which is now shown me, and which is a deed from Emma J, Keons, executrix, and Emma J,