

1, 1910.

4. State whether or not this real estate can be divided amongst the parties interested therein without loss or injury.

A. No, there are two farms and one set of buildings on each farm which makes a division impossible.

5. State if you can the approximate value of each of these farms.

A. the large farm is assessed at \$4400.00 and the smaller one is assessed at a little or \$2200.00. Each of these values are a little low.

To the general interrogatory, I don't think so.

Joseph H. Zimmerman

Charles E. Zimmerman, a witness of lawful age, being one of the complainants in this cause, being duly sworn, deposes and says:

1. State your name, age residence and relation to this suit.

A. My name is Charles E. Zimmerman, I am 24 years of age, reside neat Feagaville, in Frederick County, and am one of the complainants in this case.

2. What real estate, if any, did your father own at the time of his death?

A. My father, Joshua E. B. Zimmerman, own two farms at the time of his death, which are described in Exhibits A and B, filed in this case.

3. Whom did your father leave as his heirs at law, at the time of his death?

A. My mother, Margaret R. Zimmerman, his widow, and the following children;- Eleanor Kemp, Joseph H. Zimmerman, Charles E. Zimmerman, Maude Fraley, Howard D. Zimmerman, he also left the following children of Edgar Zimmerman, a son who died before my father died, namely:- Catherine Morgan, May Morgan, Marie Linton, Joshua Zimmerman, George Zimmerman, Howard Zimmerman, Roberta Zimmerman, Samuel Zimmerman and Dorothy Zimmerman, these are all infants excepting Catherine Morgan and May Morgan.

4. Is it possible to divide this real estate amongst all the parties interested, without loss and injury?

A. No, as the real estate is divided into two farms with one set of buildings on each farm, and you could not divide amongst all that have an interest.

To the general interrogatory? That is all.

Charles E. Zimmerman

Grayson H. Mercer, a witness of lawful age, produces on the part of the petitioners, deposes and says:

1. State your name, age, and residence.

A. My name is Grayson H. Mercer, 56 years of age, real estate and insurance agent residing in Frederick City, Frederick County, Maryland.

2. Did you know Joshua E. B. Zimmerman?

A. I did, I have known him for a period of 30 years, and sold him 2 farms and I know the farms in question.

3. Do you know by whom he is survived?

A. I know his widow and several of the children but could not name all of them but believe the children named by Joshua H. Zimmerman in his testimony are correct.

4. Do you know the farms in these proceedings and what are the values of each?

A. I have been on these farms and to the best of my knowledge the larger farm of 121 acres is worth \$3500.00 and the smaller farm of 38 acres to be worth \$2650.00.

5. Do you believe it would be advantageous to sell the farms at once?

A. I believe that it would be to the best advantage to sell these farms as soon as convenient as these farms cannot be divided among the numerous parties interested.

Grayson H. Mercer.