

Bessie H. Zimmerman, a witness of lawful age, produced on behalf of the Plaintiffs, being duly sworn, deposes and says as follows:

Q. Will you state your full name and address, please.

A. Bessie H. Zimmerman, Thurmont, Maryland.

Q. What is your age?

A. Seventy-two.

Q. What is your business or profession?

A. I have been for almost twenty-five years matron at the Rosewood State Training School, but the first of October, 1941, I retired.

Q. While at the Rosewood Training School did you come in contact with Charles Allen Seiss?

A. Yes, I did.

Q. Will you explain generally what is the physical and mental condition of Mr. Seiss.

A. He is a helpless imbecile, I would say. He is perfectly helpless. His legs are crossed, and he has no movement in his arms. I think that his arms and legs are not normally developed either.

Q. Can he speak?

A. No, he can't. He used to make some sound but he is unable to do that now.

Q. Is it possible in any way to communicate with him?

A. I don't think so.

Q. From your observation, is it your opinion that it would be impossible for him to transact any matters of a business nature?

A. Oh, my yes! Very decidedly.

To the General Interrogatory: As Charles Allen Seiss grows older he is getting worse. At first if you talked to him he would smile and laugh, but now he doesn't pay any attention to anything. His face is a blank. He is in a wheel chair all day, lying down, and is moved entirely by other people

Q. In your opinion, is there any hope of recovery?

A. There is none. I believe his condition grows worse with age.

*Bessie H. Zimmerman*  
Deponent