

(Plaintiffs' Exhibit A, B and C identified by the Plaintiffs as being copies of the original deeds and offered in evidence)

- Q. Who were the heirs at law whom your mother left surviving her?
- A. I, Paul L. Willard, am the eldest living child, having been born on November 2, 1907. I have a sister, Virginia W. Marsh, who is married to Ralph Marsh, who is approximately 45 years of age. My wife's name is Elizabeth M. Willard. My wife and I live at R. F. D. #3, Frederick County, Maryland and my sister, Virginia W. Marsh and her husband now reside in Philadelphia County, State of Pennsylvania. My mother and father had three children, the eldest, now deceased, being Clark L. Willard. He died prior to the death of my mother. My brother, Clark, left surviving him, three children, namely, Richard W. Willard, who is over 21 years of age, a son, Edward C. Willard, who is approximately 19 years of age, and a daughter, Barbara A. Willard, who is approximately 14 years of age.
- Q. What is the residence of the children of Clark L. Willard?
- A. Richard Willard is now residing in Middlesex County, State of Massachusetts. Edward C. Willard is presently a member of the Air Force of the United States and he lives at Plandome Manor, Nassau County, State of New York. Barbara A. Willard is at present residing at Plandome Manor, Nassau County, State of New York.
- Q. Did you and your sisters and the heirs of Clark Willard enter into a contract of sale of the land owned by your mother?
- A. Yes, on the 3rd day of March, 1956, all the heirs at law of my mother executed a contract of sale for the property on Rosemont Avenue with <sup>Mamie Purdum,</sup> George Stup and Laura Stup, his wife. The contract was signed on behalf of the minors by Richard Willard, next of friend. (copy of contract shown to the Plaintiff, identified and offered in evidence).
- Q. What was the sale price set out in said contract?
- A. \$19,000.00.
- Q. Do you feel it would be to the best interest and advantage both of the infants and the other persons interested in the real estate to have said contract confirmed by this Court and to have said real estate, upon the payment of the whole of the purchase money aforesaid, conveyed to said purchasers by such person or persons as the Court may appoint for that purpose?
- A. I consider it definitely to the interest of the adults as well as the minor