

penny to do the work, I guarantee I could get a contractor to go there and dig it out, if you would just give me so much money.

Q Let me ask you this: Are you familiar with land values in Frederick County?

A No, I am not.

Q I believe you said last year was the first time you had ever been on the property?

A That's right.

Q And you have also testified it would be difficult to locate Jereline Johnson's ten acres of this tract, is that correct?

A I didn't say it was difficult. I said out of 58 acres of land there, ten acres can be anywhere within that 58 acres.

Q That is what we are speaking of.

A I am not a surveyor that I could go and survey that ground out and say this belongs to us, no.

Q Do you know whether any of the heirs have sought to pay off and buy this property and pay all the other parties in interest?

A No, I don't know of any other heirs, but I have talked to another prominent lawyer that is in Virginia - a white lawyer - that was before we heard of this lawyer here. Just from the description of what I told him: 58 acres of land up there - and what we were told from someone who called me on the phone and said the land is devaluating, it is no good, and if you don't sell it now it won't be worth \$100. I spoke to the lawyer we first went to. He says he has never heard of land that is devaluating, and "if it is 58 acres of land, and you got any land you want to give away and it all belongs to you, I'll give you \$6,000 without even looking at it." That is just the opinion I got from the lawyer.

Q However, that is not from your actual knowledge, is it? That was passed on to you by this other attorney?

A Well, it is halfway my knowledge and halfway what he told