

Q. On this picture, Mr. Summers, I invite your attention to something that looks like stones just in front of the gateway and ask you are those stones or stones that look like them still there?

A. Yes, the large flag stones are still in the same position they have always been.

Q. How large are those flagstones?

A. It takes approximately five of them to go across the whole front of the house.

Q. About what size are the flagstones?

A. About five feet long and four feet wide. Almost square.

Q. How deep do they go into the ground?

A. I have no idea.

Q. Have you ever tried to move them?

A. No.

Q. They have been there as long as you remember?

A. They have always been there. The porch joined on to the big flag stones. You can see them on the other picture - the second exhibit.

Q. Now, Mr. Summers, during the time you lived on the property and to your personal knowledge of the property, what changes have been made in the road - in the state road?

A. Well, from a small child I can remember it being a narrow black top road, then they added the concrete shoulders on both sides then the latest development was when they widened it to three lanes. They raised the road approximately one foot in front of the house.

Q. Did that require any negotiations between your mother and the State Roads Commission?

A. The only thing that happened was after they raised the road the water was running into the front of our property and they put a concrete abutment there diverting the water down the road past the house.

Q. Now, Mr. Summers, referring to Defendant's Exhibit Plat #8937, the C&P Telephone poles are outlined on this and appear to be several feet in front of the dwelling. Has there been any change in those poles during your memory?

A. Not that I know of.

Q. Now, also referring to this plat and to the two story brick dwelling and through which the State Road/line ^{right of way} appears to run. What is the topography of the land just West of the dwelling?