

Q. Have you made efforts along that line?

A. I have made efforts many times especially in that locality.

Q. The locality of Old Braddock?

A. West to the top of the mountain practically.

Q. Can you with definiteness determine the south line of the State Roads right of way in that area.

A. I cannot.

Q. Have you done any work on this particular property?

A. On this particular property I have a map here.

MR. NEWMAN:

Q. What kind of a map is it and where did you get it.

A. It's a map of property to William F. Grove from Grace Summers. I made it. It's got my name on it, and this shows the title clear back to 1800. I made this map in 1947. This shows this particular property clear down to the Country Club Road. It shows the adjoining Summers property and the piece that then belonged to C. C. Klein and clear over to the -- clear over across the new dual highway and where the State Roads bought the piece off of them. At that time William F. Grove and wife bought from the center of the road from the Summers and the descriptions going back carry across the State Road without any reference to it. And they paid taxes on it straight through.

Q. Who?

A. The Summers. Grace R. Summers then was a widow. In about - I forget the year - 1948 or 9 - maybe later, the State Roads did come up and acquire a right of way. I think they cut some off of Grace Summers and they went at that time 150 feet west of the Country Club Road and stopped. Plat 8936 I believe it was. And on the north side at the same time they got a right of way from Grace Summers and got it on Plats 8936 and 8937 which went further west. But they never attempted to get a right of way up the hill from there as I could find on the record of Grace Summers. But they did buy a piece - Plat 8936 I believe. It is all a matter of record over there. You will find deeds from Mary Summers in Liber 496, Folios 25 and 27 and from Grace R. Summers you will find in the same book - Liber 496, Folios 86 and 88 and those two deeds only mention 9449 which shows a drainage easement only and the 8936 which goes approximately 100 feet west of the Country Club Road and they are the only ones over there where Grace Summers ever conveyed anything to the State Roads that is on record.

MR. STORM:

We would like to introduce this map as Exhibit " 7 ".