

MR. NEWMAN:

I object to that.

Q. If you know, what is the policy of the State Roads in reference to houses which were built before turnpikes were built. Does the state claim to own part of those houses?

MR. NEWMAN:

I object.

A. I wouldn't like to answer that. That would be more of a legal question. All I could give you would be an opinion. You don't want guesses. The state's policy might be one thing in one case and another thing in another case. But I wouldn't want to say what their policy is.... in every case.

Q. Do you know what is the basis for the state's claim of 66 feet in this particular area?

A. This was - I had our Records and Research Section look this up and everything on here is 66 feet. It doesn't give any courses or distances or how you can pin it down, but it definitely states that the grant was to be 66 feet.

Q. This paper we will mark as the next Defendant's Exhibit. Mr. Perkins, this is a summary of the --

A. That was a summary of that turnpike width along Braddock through the different locations there.

Q. These are your records on which the State Roads relies?

A. That's right.

MR. NEWMAN:

Q. Mr. Perkins, that last piece of paper you submitted, you got that from the records?

A. From our records. From our Records and Research Unit down at the office.

Q. You said something about people feeling that they owned part of the right of way, that they planted flowers and trees.

A. I was not referring to turnpikes. On this turnpike, they only build a certain part - they didn't utilize the whole 66 feet and people feel - we have the same thing on present day right of ways - they will plant their flowers and shrubs and then they say somebody should have told us about this.

Q. Then you are speaking only of rights of way.

A. Yes, I think it has been pretty well pinned down in the last 15 or 20 years. You can actually reproduce it.

Q. There is a difference between the plats which have been made over the