

DRAPER K. SUTCLIFFE, a witness of lawful age, first being duly sworn, testified as follows:

BY MR. NEWMAN:

Q. Will you tell us your name, residence and age?

A. Draper K. Sutcliffe, 43, 3639 Forest Hill Road, Baltimore County. Office, 120 West Church Street, Frederick.

Q. What is your occupation?

A. Registered land surveyor.

Q. Mr. Sutcliffe, how long have you been a registered land surveyor?

A. For the last twelve years I have had my registration.

Q. Where did you study to be a registered land surveyor?

A. I am a graduate of the University of Maryland, 1948, with a B.S. in Civil Engineering.

Q. What other education have you had in regard to surveying?

A. I had some experience with the State of Maryland with their Department of Home Improvement from '48 to '55 at which time I established my own private practice.

Q. Mr. Sutcliffe, did you make a survey of property on Route 40-A near the Village of Braddock generally known as the Summers property.

A. Yes, I did.

Q. I show you this plat and ask you if you prepared that plat from your survey?

A. Yes, I did.

Q. That plat shows the southern line of U. S. Route 40-A passing through a brick house that is shown on the plat. I would like to ask you how you determined that?

A. Knowing that Route 40-A had been recently improved, I checked through the file of State Roads plats on record with the Clerk of the Court and found that Maryland State Roads plats 8937 and 8938 were situated in this area. Upon these plats I found a base line established and from this base line, <sup>which</sup> I was able to recover in my field work I was able to establish this southern line of Route 40-A.

Q. The plat to which you refer which was made by you is filed as Exhibit B in this case.

A. Right.

Q. You say that you were able to recover the same line of the road from your survey. Would you tell me how far it is from that same line to the front of the house.