

- A. It was exactly 28.8 feet.
- Q. Would you tell me how far it was from that same line to the fence on the north side of the road.
- A. That was 33 feet.
- Q. I now show you plat prepared by Frank W. Rothenhoefer dated September 12, 1947 and revised July 7, 1952, and tell me if the house which we have been discussing appears on this plat?
- A. No, it does not.
- Q. Can you locate that house on Rothenhoefer's plat?
- A. No, I feel that Rothenhoefer's plat is quite some distance to the east of our present Summers property.
- Q. This plat of Rothenhoefer's shows a center line for the road. That is the same center line that you established on your plat and which appears on the State Roads Commission plats. Or can't you say so.
- A. Yes, I would feel that it would be a continuation of the same center line.
- Q. You prepared this plat that is Exhibit B here?
- A. Yes.
- Q. That's all.
- BY MR. STORM:
- Q. Mr. Sutcliffe, in effect you took the State Roads plat and used the information shown on that plat to prepare your plat, isn't that right?
- A. As far as establishing the right of way lines and base line or center line.
- Q. Do you know of any way of actually establishing the center line as to any description or any condemnation proceeding, deed or anything at all other than the State Roads plat?
- A. I do not.
- Q. So if their plat is drawn showing the center line where they say they put it, then you would agree that is all the information you have?
- A. Would you be trying to refer to the original Summers to White description.
- Q. No, what I am trying to find out is how you or anyone else knows where the southern boundary is supposed to be since there is no description of the road itself. There is nothing anyone has been able to show to show the actual lines of the road.
- A. If I hadn't found those State Roads plats on record I would probably