DOROTHY I. GREEN, a witness of lawful age, being produced on behalf of the Complainants, after first having been duly sworn, deposes and says:

Questions by Mr. Nikirk:

Q. Mrs. Green, would you state your full name, age and residence, please?

A. Dorothy Irene Green, age 50, Route 1, Frederick,

Q. And in what year were you born?

A. In 1913.

Q. You are the daughter of Raymond O. Smith and Annie E. Smith, his wife?

A. Yes sir.

Q. Are both of your parents still living?

A. Yes sir.

Q. Is your father able to give testimony in this case?

A. No, his health will not permit him to do so.

Q. During the time that your parents owned this property, and you and your husband owned the property, do you have any knowledge of any claim having been made against it by any person whatsoever?

A. No sir.

Q. Prior to the question as being raised as to your title, have you ever heard of a person named Susan Fogle?

A. No sir.

Q. Since learning of this problem have you made inquiry as to Susan Fogle and any possible relatives or heirs of the said Susan Fogle?

A. Yes, I have inquired of numerous people in the neighborhood but nobody can recall her and nobody seems to know of any heirs she may have had. They are positive, however, that she is deceased at the present time. My mother recalls having heard people speak of her but that she is certain that she has been dead for more than fifty years, probably for more than sixty years.

Q. When was the first time you learned there was some question about the title to this property?

A. After we applied at the Union Bridge Bank for a loan.

Q. Have you and your husband paid taxes on this property during the time that you have owned it?

A. Yes sir.

Q. Are you asking in this Petition that the Court declare the property to be free of any cloud of title and declare you and your husband legal owners?

A. Yes sir.

Dorothy I. Green
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