Exhibits.

"H. 3."
Pleadings *re* Gravesande *v.* H. A. N. Burrowes and L. M. Hubbard, 1916 to 1918—*continued.*

Hubbard, deceased, dated 16th April 1910, and recorded in the Registrar's Office of British Guiana on the 11th October 1915.

FRANCIS DIAS,
Solicitor.

The Plaintiff Lydia Millicent Sutton also known as Lydia Sutton claims as Executrix under the Will of Rebecca Cornélia Adriana Backer, deceased, also known as Rebecca Backer dated 20th day of January 1908 and which was deposited in the Office of the Registrar on the 22nd day of July 1916.

Amended by order of the Court dated the 16th day of December 1916 this 20th day of December 1916. In my presence,

A true copy.

G. H. W.
S. C.

D. R. FORSHAW,
A.S.C.

G. H. WESTMAAS,
S.C.

STATEMENT OF CLAIM.

The Plaintiffs say:—

1. That they are the sole heirs *ab intestato* of Henrietta Hubbard, born Gravesande, who died in the year 1879 intestate, without issue lawful or unlawful.

The said Henrietta Hubbard was only once married and then in the year 1854 to Thomas Hubbard.

2. There survived the said Henrietta Hubbard born Gravesande, her husband Thomas Hubbard, her mother Rebecca Gravesande, born Bergh, her sister Francis Nichols, born Gravesande, her brothers Thedore Gravesande and Cornelius Gravesande and her nephew Gabriel Gravesande the younger and her nieces, Elvira de Ryck born Gravesande, Beatrice McLoggin born Gravesande, and Orella Gravesande all children of her deceased brother Gabriel Gravesande, senior.

3. The said Rebecca Gravesande, born Bergh, the mother of the said Henrietta Hubbard, born Gravesande, was only once married and then to her husband J. D. S. Van Gravesande in community of property in this Colony in the year 1846.

4. There was issue of the said marriage the said Henrietta Hubbard, born Gravesande, the said Francis Nichols born Gravesande the said Thedore Gravesande, Cornelius Gravesande and Gabriel Gravesande and no more. The said Rebecca Gravesande never had any children born out of wedlock.

5. The said J. D. S. Van Gravesande predeceased his said wife and children and the said Henrietta Hubbard.

6. By an Agreement dated the 21st day of June 1879, and recorded in the Registrar's Office of British Guiana on the 24th day of June 1879, the said Rebecca Gravesande, the mother of Henrietta Hubbard born Gravesande relinquished her half share and interest in the Estate of the said Henrietta Hubbard, deceased, in favour of the said Thomas Hubbard whereby he acquired one half of his wife's half of the common property of the marriage at the time of the death of the said Henrietta Hubbard the remaining half of his wife's half going to her brothers and sisters and their children.

Exhibits.

"H. 3."
Pleadings *re* Gravesande *v.* H. A. N. Burrowes and L. M. Hubbard, 1916 to 1918—*continued.*

7. The said Frances Nichols born Gravesande was married in community of property to Chester Nichols in the year 1863, and had five children issue of the said marriage.

8. The said Chester Nichols the husband of the said Frances Nichols died in the year 1879 before the said Henrietta Hubbard.

9. The said Frances Nichols who died intestate in the year 1885 was only once married and left as her heirs her five children, namely: Joseph, Henry, Adriana, Maria and Albert her surviving who inherited their mother's one-sixteenth in the estate of the said Henrietta Hubbard, deceased, in equal shares.

10. The said Adriana Nichols was married to John Wilson one of the Plaintiffs herein in community of property in the year 1891.

11. The said Maria Nichols was married to Manoel Nunes de Souza, one of the Plaintiffs herein in community of property in the year 1907.

12. The said Albert Nichols was married in community of property to Lilian Nichols in the year 1903 and had two children issue of the said marriage, namely: Rosaline and Montgomery, two of the Plaintiffs herein. The said Albert Nichols died intestate in the year 1912 and was only once married.

13. The said Thedore Gravesande brother to the said Henrietta Hubbard was married in this Colony in community of property to Adriana Gravesande, born Brandt. There were four children born of the marriage, namely: Conrad, Alice, Thedore the younger and Charles. He died intestate in the year 1904 leaving his wife and children him surviving and entitled to his one-sixteenth of the estate of the said Henrietta Hubbard who are four of the Plaintiffs herein.

14. The said Cornelius Gravesande the brother of the said Henrietta Hubbard born Gravesande was married in community of property to Constantia Gravesande born Van Groonigen in the year 1853 and had two children, namely: Isaac and Rebecca Cornelia Adriana issue of the said marriage.

15. The said Cornelius Gravesande died in the year 1884 intestate leaving his wife the said Constantia Gravesande and his said two children him surviving who inherited his one-sixteenth share of the estate of the said Henrietta Hubbard.

16. The said Constantia Gravesande never had any children born out of wedlock, was only once married and died in the year 1892 intestate