had no right to the Bush River plantation, and that all that he the said John Simpson, had to do in order to recover it was to summon the whole family of Wm. Andrew? If yea what were your reason for giving that information.

Wm. Martha Hays answered to the 1st. Interrogatory This deponent cannot ascertain the time but it was before the Complainant Robert Saunders went to live at Bush River plantation

2nd. This Deponent is the daughter of the said Wm. Andrew.

3rd. Answer there were disputes between Billy Drew Bunting, Priscilla Scott and Martha Hayes the elder children of William Andrew and Mary Lynchfield and her daughter the Defendant Elizabeth Simpson relative to the Estate and Will of said Wm. Andrew. The object of these disputes were to obtain the property given by the said William Andrew to them in his life time.

4th. Answer that she was not there at any time when the said Elizabeth Saunders came to pay rent for the Bush river plantation.

5th. Answers she did not hear Robert or Elizabeth Saunders say any such thing.

6th. Anshwer that she never did inform John Simpson the defendant of any such matter.

John Groves of lawful age produced and sworn on the part of the Complainant and being duly sworn answered to the 1st. Interrogatory that he did hear Wm. Andrew in his life time say that he had conveyed his Bush River plantation to his daughter Elizabeth Saunders.

2nd. Answers. That he believes the Complainant Robert Sanders and his Wife lived on the Bush River plantation 4 or 5 years before the date of the late Wm. Andrew.

3rd. Answer, this deponent doth not know of what age Wm. Andrew was before his decease but appeared (to

to be very aged, said Andrew was aged and infirm but as to the influence he has no knowledge it was generally reported they were not married.

4th. Answer he has no knowledge of this Interrogatory

5th This Deponent says the hand writing Wm. Andrew endorsed on the exhibit A.A. appears to be the hand writing of Wm. Andrew but this deponent says he is not scholar enough to be a Judge of hand writing. This deponent has seen the hand writing of Wm. Andrew and hath seen him write his name.

6th. Answer. That some in the latter part of February or the first of March 1798 this deponent heard John Simpson the defendant say, that if he obtained the land from the Complainant Elizabeth Saunders he intended to give Priscilla Scott £100

Cross Interrogatories to be exhibited to John Groves on the part of the Defendant.

1st. When where and on what occasion was it, that Wm. Andrew made the declaration noted in your answer to the 1st. Interrogatory of the Complainant in this cause? what gave rise to the conversation, and were any others and what persons present?

2nd. When where and on what occasion was it, that John Simpson the Defendant made the declaration stated in your answer to the sixth Interrogatory of the Complainants in this cause? what give rise to the conversation? and were any and what other persons present at it.

1st. Answer that at the time Robert Saunders and his Wife Elizabeth Resided on the Eastern Shore Elizabeth Saunders, made a visit to her father Wm. Andrew this deponent understood from Wm. Andrew that his daughter Elizabeth Saunders requested him to give her Inheritance Bush River plantation that the said Andrew was not pleased with his daughter the said Elizabeth Saunders living on the Eastern Shore and promised her if her husband would come over and live there he would settle them on Bush River plantation that he