he had wrote Robert Saunders the complainant to come over for that purpose, that some time after Saunders did come over and was settled accordingly that some time after the said Andrew informed this deponent that he had conveyed the Bush River plantation to Elizabeth Saunders that the above conversation took place at Wm. Andrews house about 22 years ago perhaps more or less. This deponent does not recollect that any person or persons were present but probably there might have been.

2nd. Some time in February or March 1795 Doctor Simpson the defendant inoculated three children for this deponent when Doctor Simpson informed this deponent that he had brought a suit for the recovery of Bush River plantation that this deponent remonstrated as to the injustice of the suit, Doctor Simpson replied that he had been informed that Bush River plantation was his, if so he would get it if he could and said if he took from one he would give to another, and further said if he got Bush River plantation from Elizabeth Saunders he would give Priscilla Scott 400£ his Wife was present but is now deceased.

Richard Perry of lawful age produced on the part of the complainants and being duly sworn answered to the 1st. Interrogatory. That he intended to give Bush River plantation to his daughter Elizabeth Saunders the complainant and that he allotted it for her, at this time this deponent lived with Wm. Andrew.

2nd. That Saunders and his Wife lived several years before the death of said Andrew on the said plantation but does not recollect how many.

3d. This deponent thinks Wm. Andrew was 80 years of age at his death. He was aged and infirm and was greatly under the influence of Mary Linchfield before his death that the said Mary Linchfield was a kept Mistress of said Wm. Andrew that oftentimes this deponent in the life time of Wm. Andrew's Wife has saddled a horse for said Andrew and one for himself

himself 2 or 3 hours before day for the purpose of visiting said Mary Linchfield.

4th. He has no knowledge.

5th. and 6th. waved

Cross Interrogatories on the part of the Defendant to Richard Perry.

1st. How long did you live with Wm. Andrew before his death, and in what capacity.

2nd. Have you ever heard from Robert Saunders or Elizabeth Sanders the complainants that they or either of them paid rent to the said Wm. Andrew for the Bush River plantation? if yea when, did you hear it?

3d. How long before the death of the said Wm. Andrew did you leave his service?

4th. Were you ever at the house of the said Wm. Andrew after you left his service

1st. Answer This deponent lived with the said Wm. Andrew upwards of 12 years in the capacity of a hired servant and a common Labourer.

2nd. He did not.

3rd. To the best of this deponent's recollection it was twelve or 14 years before the death of the said Wm. Andrew that this deponent left his service.

4th Answer he was not.

Adjourned to Saturday next 10 o'clock on the part of complainant.

Baltimore 19th. July 1800

Commissioners met at the House of Samuel Vincent agreeable to adjournment, and adjourned to Mr. Enoch Churchman's

Mr. John Durham of lawful age produced on the part of the defendant having refused to take the oath and not being Quaker Menonist or Dunker he was not examined.

Interrogatories to be administered on the part of defendant to Wm. Chambers of lawful age.

1st. How long have you been acquainted with Robert Sanders.

2nd