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adjournment. Additional Interrogatory to be put to Mary Hammond on the part of the Defendant.

Look at the exhibit C now produced to you and at the deposition at the bottom of it purporting to be a deposition sworn to by you, relate particularly and fully all the circumstances which attended the execution of that paper, and the making of that deposition, and relate particularly whether at the time of making the said Deposition any thing was read to you respecting an agreement or promise in writing by the said William Andrew, and whether the words "in writing" which are interlined appear in the said deposition at the time of your swearing to it; relate also whether the said deposition, before being sworn to was read to you by the Magistrate before whom it purports to have been sworn or in his presence, relate particularly by whom when and in what form it was read to you And whether it is the same deposition to which at that time you intended to swear.

Mrs. Mary Hammond in continuance.

This Deponent can neither read or write and therefore cannot say that she knows the Exhibit C but this deponent says that some time in the year 1784 Robert Saunders and this deponent made an agreement that in case the said Saunders would assist her in procuring the Will of William Andrew deceased and establish the same, she would endeavour to get her daughter Elizabeth DW. Andrew to consent to make over her right to the Bush River plantation when she became of age, and in case of the death of the said Elizabeth DW. Andrew this deponent would give her own title to the same, the said Robert Saunders considering the right of said Land to be her daughters as this deponent then understood from him said Robert Saunders, In consequence of this agreement this deponent executed a Bond to that effect some time in the month of April 1794 at the house of Job Garreston and in his presence

This Deponent further says that some time in the same Month but whether before or after the execution (of

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this said Bond by her, Robert Saunders the Complainant asked her if she never heard her husband William Andrew say that he intended the Bush River plantation for Elizabeth Saunders the Wife of the said Complainant. This Deponent said she had but also informed the said Robert Saunders that had also heard William Andrew say that he should never have a foot of his Land as long as he lived nor after his death, this deponent informed the said Robert Saunders that she had also heard said Wm. Andrew say that on account of his ill ill treatment to him the said William Andrew, that he would not give his Wife Elizabeth Saunders any Land said Saunders replied never mind that - but if you will swear that you have heard Wm. Andrew say that my wife Elizabeth Saunders should have Bush River plantation that will do for it will bear some weight before the Chancellor to compel her Daughter Elizabeth DW. Andrew when she came of age, to convey the Land to them, not saying to whom. This Deponent replied to said Saunders if that is all you want I can do that, after the above conversation a Deposition was read to this Deponent in the yard at Colonel Garretsons by the said Robert Saunders but no other person was present after hearing the said Deposition read this deponent consented to come to Baltimore with Robert Saunders and swear to it, the contents of the deposition then read to this deponent, was as above related, this Deponent and the said Robert Saunders then went to Baltimore before Peter Shepherd Esquire a Justice of the peace; the said R Saunders then handed a paper to the said Peter Shepherd Esquire which this deponent then supposed to be the same paper which was read by said R Saunders to this deponent in the yard of Job Garretson, as above mentioned. Peter Shepherd Esquire holding the same in his hand asked this deponent if she knew the contents of the paper, this deponent replied yes, that Mr. Saunders had read it to her. This deponent then made oath to the deposition before the said Peter Shepherd Esquire who subscribed his name thereto as this deponent believes. This deponent to the best of her knowledge never