for want of nursing and attendance of which, she stood as much in need as an infant, and that she was well acquainted with Caleb Moran son of Mercer Moran the elder, and that he required much assistance at the same time, this deponent further sayeth that some days after Mercer Moran the elder, had somewhat recovered from his indisposition, she heard him repeatedly say that he knew nothing concerning such notes, and that if they were such notes in existence, he was entirely ignorant of them and believed them to be a forgery, and that he had offered to his son Mercer Moran the whole of his property if he would come and take care of him, which he refused to do, further this deponent saiyeth not.

Abigal Morans deposition – On this 30th June 1826 personally appeared Abigail Moran before me the subscriber commissioner named in the aforegoing commission, she being sworn on the Holy Evangely of Almighty God, deposeth and sayeth that she was acquainted with Mercer Moran the elder, and that she saw him on the day which he had the fit and that he seemed to be perfectly insensible, and to all appearance dying, and that she saw him again in the morning of the second day, and that he seemed to be incapable of transacting any business, that she spoke to him, he made no reply and seemed to be insensible, and also the third day she saw him, and she still thought him insensible, this deponent further sayeth that she was well acquainted with the wife of Mercer Moran the elder, and that she required constant nursing and assistance and was confined to her bed, and was unable to get up or dress herself only when she was assisted, and that Caleb Moran son of Mercer Moran the elder was, as he now is much afflicted and needed much waiting on, further this deponent saith not.

Benjamin Woods deposition On the 30 June 1826 personally appeared Benjamin Wood before the subscriber commissioned named in the aforegoing – he being sworn on the Holy Evangely of Almighty God deposeth and saith

1st Question to Benjamin Wood. Did Mercer Moran the elder request you to keep the giving of these notes a secret during his life.

Ans. Yes he did.

Benjamin Woods deposition taken in open court 29 Augt 1822 is handed to him.

2nd Quest. Are the facts stated in said deposition true in every particular

Ans. They are.

3rd Quest. Where was Mr Broome when the notes were signed

Ans. I do not exactly know.

On this nineteenth August 1826 personally appeared John B Thomas

before me the subscriber commissioner named in the commission, he being sworn on the Holy Evangely of Almighty God deposeth and sayeth that he once happened in company with Mercer Moran Jr in the town of Port Tobacco and in a conversation between them the said Mercer Moran told him he had two notes for sixteen hundred and seventy five dollars each on Hooper Broome, which notes he said were given by his father Mercer Moran Senr and drawn in favor of himself, and one drawn in favor of Samuel C Moran and that he had traded with Samuel C Moran for the latter note, that his father Mercer Moran the elder gave those notes by way of making a distribution of his estate, that Mercer Moran the elder had made a valuation of all his property himself, and was about to give his notes for a much larger amount than the above, but that he Mercer Moran Jr told his father that he had valued his estate too high and desired that he would let him Mercer Moran Jr value his property for him, to which the old man consented, that he Mercer Moran Jr then made the valuation himself, and the notes were drawn accordingly, each note for sixteen hundred and seventy five dollars, this deponent further sayeth that the said Mercer Moran Jr told him, that the given of said notes were to be kept secret fearing it might make a disturbance in the family, and that while they were in the act of fixing said notes Mrs Broome was coming in and that he Mercer Moran Junr went out and met her, telling her that they were taking a bill of sale from his father for a negro girl and kept Mrs Broome in conversation out door until the notes were all given, further this deponent sayeth not.

I beg leave to return to the Honorable the Judges of Charles county court court sitting as a court of Chancery, that in virtue of the annexed commission to me directed, having first myself taken the oath aforesaid, to the said commission annexed, and presented for them to take, and having also administered to William Lynch the person by me appointed clerk of the said commission; the oath to the said commission annexed, and presented for him to take, I have caused the several witnesses to be sworn, and their depositions fairly and truly to be written down as by the said commission I am directed, all which together with the said commission I return closed to your Honorable court under my hand and seal this thirtieth day of August in the year of our Lord one thousand eight hundred and twenty six, as by the said court I am directed.

William Morton.

Thereupon on motion of the said Hooper Broome and Mary Broome his wife by their Solicitor aforesaid, it is ordered by the court here that the commission heretofore issued in this cause be again demanded to the said William Morton commissioner therein named, with power to take depositions under