she owed Jos money and intended the land for him and had told him to get a deed drawn and she would sign it at any time which she repeated to me several times-
7th I know of no Contract and as to what money was paid I know nothing of.
8th I do not know
9th I do know that there were improvements made upon the land by Jo Shepherd but know of no Contract relative thereto and heard no Conversation between Joseph and Mary relative to said improvements or the sale of said land.
10th He knows nothing of the receipt or the payment of the money therein mentioned.
11th He knows that Jo. Shepherd is in possession of a tract of land formerly belonging to Mary Shepherd being the same that was willed to him by his father but knows of no particular agreement between them-
12th I have heard her say several times that she had given the land to Joseph that he is now in possession of, and wished to know of me what he was doing thereon.
13th She did not Consult or advise with me much about the land
James Owens Senr answer to Complainants 1st Addl Inty
He is a Carpenter by trade he lives at present with his sisters and resided with his mother at the time of her death and superintended her affairs and thinks his services worth to his mother seventy five dollars annually
2d Addl Inty He heard her say that Joseph paid the taxes on the land that She would not pay the tax on the land as she had given it to him but he knows not to whom it was assessed-
3 Addl Int The same answer as Jos Owens Senr
Croft Interrogatories James Owens Senr answer to the defendants
1st Interrogatory, Mary Shepherd always refused to sell the land as it was her fathers and intended it for her son Joseph
2d She never said any such thing in my presence
3d He never heard any such Conversation
4th She always expressed her willingness to me to give him a deed whenever he would have one prepared
Answer of Complainants witnesses to Complainants Interrogatories
Joseph Owens Senr being sworn answered to the
1st Int I do and have ever since Childhood
2d I know the tract or parcel of land but do not know the tract or parcel of land but do not know the name or quantity of acres
3d I believe the land to be in possession of Jos Shepherd and was in his possession at the time of his mothers death and at least two years prior thereto
4th I have no personal knowledge of any improvements being put on the farm by Jo. Shepherd
5th Int Mary Shepherd stated to me that Joseph Shepherd was making improvements on the land and she was gratified at it
6th Int I know of no Contract
7th Know of none

8th I have no knowledge of that,
9th I know of nothing but what has been stated.
10th I have no knowledge of the transaction
11th Jo Shepherd is in possession of a tract of land formerly belonging to Mary Shepherd and believes it to be the same land devised to him by his father but knows of no agreement between him and his mother relative thereto.
12th About two years since, He Jo Owens and Doctr James Owens visited Mary Shepherd when in Conversation with her she remarked to him that she had spoken to Doctr James Owens to write a will and some other papers for her and that she regretted that he (Doctr Owens) had not brought them with him that she had directed her son Joseph to take possession of the farm which he now occupies and improve it as his father had left it to him in his will remarking at the same time that he had no right to make such a will but she wished him to have it or words to that effect
13th He was not Consulted or advised with by the said Mary Shepherd in relation to said land,
1st Additional Interrogatory I know him to be a Carpenter by trade he resides with his sisters at present and resided with his mother at the time of her death, and attended to his mothers affairs generally she Considered his services indispensable but am unable to say what his services were worth
2d I have no knowledge of any thing relative thereto-
3d I should say that his income from his profession is worth one thousand dollars per annum and I Consider him an active intelligent and thriving man and from his sober persevering and economical habits is likely to accumulate handsome property in a reasonable time
4th I have no knowledge thereof.
Croft Interrogatories, Joseph Owens Senr Answer to defendants Interrogatories has no knowledge of any thing Contained in said interrogatories Commencing at the 10th Interrogatory
Answers to defendants witnesses
Enoch Owens being sworn answered to the defendants Interrogatory as follows, to the
5th Int He had a negro man two women and a boy in 1847 and since and a white man in 1847 about two thirds of the year the negroes belong to Jo. Shepherd he thinks whose services are worth one hundred dollars annually, the service of the white man for the time he was there were worth about forty five dollars previous to 1847 he knows very little about the labour done on the farm.-
6th He knows nothing about it.
7th Int he knows the land does not know the quantity but the quality is good the improvements consist of a dwelling house very much out of repair two barns and some other out houses and lies about one and a half miles in a direct line from Mr Shepherds late residence and the land is worth about forty dollars pr acre the products are wheat corn and Tobacco but knows not the annual value thereof
8th He does not know to whom the land was assessed or by whom the taxes