Know Ye, that you are appointed Commissioner to examine Witnesses in a Cause depending in the Superior Court of Baltimore City as the Equity side thereof between Thomas B. Watts Complainant and Greenbury B. Wilson Defendant —

Therefore you are requested after having taken the oath hereunto annexed and administered the annexed oath to the person whom you shall appoint as Clerk to attend the Execution of this Commission that at such time and place as to you shall seem convenient you cause to come before you all such Witnesses as shall be named & produced to you Either by the Complainant or the Defendant and that you Examine them upon their Corporal oaths to be by you administered on the Holy Evangelys of Almighty God touching their Knowledge or remembrance of anything that may relate to this cause aforesaid and having reduced the depositions of the Witnesses so taken by you into writing, you send the same under your hand and seal to the Judge of the said Court with all convenient speed.

Witness the Honorable William Frick Judge of our said Court the first day of May in the year of our Lord one thousand Eighteen hundred and fifty two —

Issued the 12th day of May 1852.

Edwd Dowling Clk

Filed 25th Sept 1852

Bill of Discovery

Thomas B. Watts vs Greenbury B. Wilson } In Equity. To the Honorable William Frick Judge of the Superior Court sitting in Equity

The Plaintiff asks that the Defendant may be required to answer under oath this Bill filed for discovery only.

Your Petitioner alleges that a suit is now pending between your Orator and the Defendant in which under the Commission issued for the taking of testimony in the same, the defendant has filed as an exhibit a paper marked defendants Exhibit P. which was obtained from your Orator merely for the purpose of being used by the defendant in in a suit pending between this defendant and one Samuel Davis relative to the possession of the Bare Hill Copper mines and also with the express promise made to your Orator by this defendant that he wanted and would use it for no other purpose and that said Exhibit was given to him the Defendant, simply to aid him in getting possession of the said Copper Mines from Samuel Davis by purchase of the Defendant of the unexpired term of the lease of said Davis

And your Orator also alleges that the Defendant has referred to and made a part of his answer in the original suit pending between your Orator and the Defendant a petition & Bill filed against Samuel H. Tagart in the cause of Johnson Hook against your Orator in the Equity side of Baltimore County Court referred to in the Defendants answer to the original Bill of Complaint — which said petition this Defendant obtained from your Orator with the express promise and

understanding that said petition was necessary to enable him he said defendant to defend your Orator against the claims of Isaac Tyson Jr and that the said defendant also stated to the wife of your Orator and also to your Orator that said petition was intended merely as a matter of form and your Orator therefore prays that the said defendant may answer under oath the following

1. Did you not bring out and present to Thomas B. Watts at his house on Bare Hill Farm in Baltimore County the Exhibit C. H. B filed by the Complainant and admitted by your Counsel to be in your handwriting and ask said Watts to sign said Exhibit?

2. Did you not then say to said Watts, after he signed said Exhibit above mentioned that he had better write a paper in his own handwriting like the said Exhibit and did not the said Watts, accordingly write for you the Exhibit P filed by you in the original cause?

3. Did you not state to said Watts, at the signing and writing of said Exhibit P. that you wanted said paper at the trial then coming on between you and said Davis and for no other purpose or words to that Effect?

4. Did not said Watts sign said Exhibit P. a few days before the trial came on between you and said Davis at the Bare Hill Copper Mines?

5. Did you give said Watts any money or other consideration for said paper at the signing thereof, if so, state how much and what consideration you gave said Watts therefor — and did you take any receipt from said Watts for the same?

6 Did not E. G. Kilburn as your Counsel present said Exhibit at the subsequent trial between you and said Davis.

7. Did you Ever have any conversation with the wife of Thomas B. Watts about the Bill & Petition filed against Samuel H. Tagart referred to in your answer to this Complainants Bill;

8 Did you Ever say to the wife of said Watts that you heard she was dissatisfied about said Bill and that she need not be uneasy that it was mere matter of form — that said Bill was necessary to enable you to defend her husband from the claims of Isaac Tyson Jr; but if she was dissatisfied you would throw it up and let Tyson take it — and that you Expected to make a little money for yourself and a good deal for Mr Watts — or any words to that effect;

9. Did you not state to said Watts at the signing of said Bill that it was a matter of form only and that you wanted it merely to carry on the suit with Isaac Tyson Jr —

State of Maryland, Baltimore City

On this 25th day of September 1852, before me a Justice of the Peace of said State and for said City appears Thos B. Watts Complainant in the above case and makes oath in due form of law that the aforegoing Bill is not intended for delay but that the answers thereto are desired for the purpose of elicating the merits of the cause

Wm H. Dayzand