on behalf of the Defendants to William A. Talbott a witness to be produced sworn and examined in that behalf before Frederick Pinkney Esquire Commissioner

1st Did you know the late Hannah K. Chase and how long and when did she die

2d Were you or not cognizant of her having executed the Deed of Trust bearing date on or about the second day of August 1844 to and in favor of Nathaniel Williams and Joseph B. Williams two of these Defendants which Deed is referred to and makes a part of their answer in these proceedings

3d Did the said Hannah or not execute a Deed of Trust in your favor on or about the 25th day of March 1845 and is the Exhibit here-with filed and marked "Defendants Exhibit X No 1" an office copy of the last mentioned Deed of Trust

4th Did you or not accept the last mentioned Deed of Trust and take upon yourself the burthen of executing the same.

5th What amount of rents and other moneys did you collect under and in pursuance of the said Deed of Trust from the date of the same until the present time. Please to set forth the amounts so collected in each several year.

6th Did you or not apply the proceeds so collected towards the payment of the debts acknowledged to be due or established against her after deducting a sum deemed necessary for her support and what was that allowance.

7th When you took upon yourself the execution of the said Deed of Trust what was the amount of debts you were led to suppose due from the said Hannah and what did she allege or believe herself then to be.

8th Was there or not a portion of the ground rents pledged to John Morris by the said Hannah for $2,250. dollars on or about the 14 day of September 1844. And was that ground rent pledged for a debt of the said Hannah or for her grandson William Chase Pairney.

9th Were the debts exhibited to you after the Deed of Trust in your favor greater in number and amount than you expected them to be when you took upon yourself the said Trust and how much greater in number and amount

10th Were the debts so exhibited contracted for and on her own account, or were they or not for and on account of her grandson William Chase Pairney

11th Did or did not the said Hannah deny most or some of the debts so exhibited to you and what proportion did she deny

12th Did or did not the said Hannah allege that her name had been signed to notes without her knowledge or consent and to what extent or number.

13th Do you or not know that some of the notes and which of them set out and referred to in the testimony produced on the part of the Complainants were obtained from the said Hannah either without or upon inadequate consideration

14th Did you or not previous to the execution of the Deed of Trust to you or your consenting to take on yourself the burthen of the same, enquire into the amount of debts due from the said Hannah on notes or otherwise, and when did you make the enquiries: And what was the amount so ascertained by you exclusive of the Debt secured to John Morris by Mortgage.

15th Did you afterwards and how soon thereafter ascertain that much larger debts were brought against the estate of the said Hannah and to what extent or thereabouts.

16th Did the said Hannah admit her indebtedness and the further and additional claims brought in against her estate

17th Did she or not allege that most or many of the notes stating such additional claims were forgeries.

18th Did you or not from your own knowledge of her handwriting and of the course of her life, believe many or all of the notes last referred to to be forgeries

19th What was the age of the said Hannah on the second day of August 1844.

20th From your knowledge of the said Hannah's affairs as her Counsel or otherwise do you or not know that her grandson William Chase Pairney had great influence upon her and did he not exercise that influence to obtain notes from her for his own purposes and to what extent.

21st Did you or not collect the rents described and referred to in the said Mortgage from Hannah K. Chase to John Morris at any time; or if at any time until the said John Morris was paid the Mortgage debt with interest.

22d Do you know any other matter or thing material to the Defendants If so, state the same as fully as if particularly interrogated thereto.

Nathaniel Williams
Solicitor of the Defendants

"Interrogatories"

Daniel B. Banks
vs
Mary C. Pairney & others

In Baltimore County Court in the Equity Side thereof

1848

Interrogatories to be propounded on behalf of the Defendants to Mrs Mary C. Pairney and Mrs Catharine Chase Oldfield Witnesses to be produced sworn and examined in that behalf before Frederick Pinkney Esquire, Commissioner

1st Were you related to the late Hannah Kitty Chase of Baltimore deceased. If yea, state in what degree, and when she died, how old she was at the time of her death, and what was the condition of her mental and bodily health in August 1844 and afterwards

2d Do you know whether she was possessed of any real or personal property on the 2d of August 1844 and afterwards. If yea, state the description and amount and value thereof as nearly as you can, and what were the annual profits and rents thereof and when the same were due and payable, and if they were usually and generally paid when due and payable or not—