December Term 1857

Williams and others } Equity Side thereof
vs
"

Interrogatories to be propounded on behalf of the Defendants to William A. Talbot and George W. Dobbin Esquires Witnesses produced sworn and examined in that behalf before Frederick Pinkney Esquire Commissioner

1st Do you know what was the value of the life estate reserved by Hannah K. Chase in her deed of Trust to Nathaniel and Joseph B. Williams of the second of August 1844. If yes, state the value thereof and its annual rents and profits.

2d What was the condition of the mental and bodily health of the said Hannah K. Chase on the second day of August 1844? Did she appear to be in good firm health and likely to live for sometime thereafter

3d Do you know the amount of her debts due and owing by her at the date aforesaid; If yes, state the same,

4th Do you know what were the habits of the said Hannah K. Chase and her disposition at the time aforesaid with respect to the management of the expences of her household and personal subsistence If yes, state the same and the amount expended therefor per annum.

5th Do you know what were the motives and considerations which induced said Hannah K. Chase to execute the Deed of the second of August 1844. If yes, state the same.

6th At what times and dates were the rents and profits of the said life estate of said Hannah K. Chase due and payable and were the same regularly received when due and payable or were they not; Answer to your answer a list of the said rents with the dates of their being payable

7th Did you know William Chase Barney. If yes, had he acquired and did he exert about the time of the execution of the aforesaid deed of Trust before and afterwards an undue influence over the Will and understanding of the said Hannah K. Chase which she was too weak to resist; If yes, did he thereby obtain property, money and promissory notes from her, And if you know state the amount thereof This Interrogatory seeks your knowledge if derived from the said Hannah K. Chase, the said William Chase Barney or otherwise by your own observation.

8th Had the Defendants or any of them any knowledge or notice of the Execution of the aforesaid deed of the second of August 1844 at the time of its Execution or before

9th Did the said Hannah K. Chase at the time of the Execution of the said deed of second of August 1844 object to convey away her life estate in the property embraced therein, and what reasons did she assign for withholding her life Estate

10th Did or did not the said Hannah K. Chase receive some rents which did not pass into your hands, which she applied to her support and did you ever collect any rent for the Mansion-

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House partly occupied by her and do you know the amount of those rents.

11th By whose advice was the Deed of Trust of the second of August 1844 prepared and who were her Counsel; were the contents fully understood by her when she executed it, and did she execute it freely and willingly.

12th Did Daniel B. Banks or any of the creditors know of the influence of William Chase Barney over the mind of the said Hannah Kelly Chase or of the want of consideration or of the nature of the consideration for the notes held by the said William Chase Barney

13th Do you or not know of the said William Chase Barney getting possession of and selling and expending the proceeds of the said Hannah K. Chase's Stock. And what was his pecuniary condition at and about the date of said deed.

14th Had not Daniel B. Banks actual knowledge about the time of its Execution of the deed of the second of August 1844. and had he not actual knowledge of the deed from the said Hannah K. Chase to William A. Talbott of the twenty eighth of May 1846 and did he not prefer any claims under said last mentioned deed.

15th From your best information are you or not of opinion that many of the notes presented for distribution shares or payments under the deed of Trust to said William A. Talbott ante dated.

16th Do you know any other matter or thing material or important to the Defendants in this case or any of them; If so, please state the same as fully as if you were particularly interrogated thereto.

Brent and May
Solicitors for the Defendants

Daniel B. Banks and others } In Baltimore County Court in the
vs } Equity side thereof
Mary Barney and others

1848
"

At the further Execution of the annexed Commission to me directed by the Honorable the Judges of Baltimore County Court sitting as a Court of Equity I Frederick Pinkney Commissioner in the said Commission named met on the fifteenth day of October in the year of our Lord eighteen hundred and fifty one and assigned the twenty second day of October in the same year at four O'Clock in the afternoon and my office in Court House Lane in the City of Baltimore and State of Maryland as time and place for the Examination of Witnesses under the said Commission; at which last mentioned time and place the Commission met pursuant to notice, when the Defendants solicitor filed with me the two Exhibits hereunto annexed and I proceeded in the presence of the Solicitors of the respective parties, to take the following depositions, that is to say;

William A. Talbot a Witness of lawful age produced on behalf of the defendants, being first duly sworn on the Holy Evangels of Almighty God, being examined on the interrogatories propounded to him in that behalf and hereunto annexed, makes oath, deposeth and saith as follows, that is to say—