The Complainants Solicitor requests the Commissioner to insert that he objects to the competency of Mr Jacobs as a Witness and to all and every part of the Interrogatories propounded to him and his answers thereto)

The Commission was then adjourned to the 25 day of November in the year of our Lord 1851 at 11 O'clock in the forenoon and the same place at which last mentioned time and place the commission met pursuant to Notice and proceeded in the presence of the Solicitors of the respective parties to take the Solemn deposition that is to say,

Mary Barney a Witness of lawful age produced on behalf of the defendants being first duly sworn on the Holy Evangelists of Almighty God being examined on the interrogatories to her specially propounded in this behalf and herewith annexed makes oath deposeth and saith as follows that is to say Page 3 of interrogatories

1 To the first of said interrogatories that Witness is the daughter of the late Hannah K Chase She died on the 2 day of March in the year 1848 and was upwards of 90 years old at the time of her death Witness cannot here how much older than 90 years she then was exactly but believes and is pretty confident that she is right that she was 90 years old. In August in the year 1844 the mind of her said Mother Hannah Kelly Chase was sound and she was very capable of transacting business though her memory was weak in July in the year 1845 She had a severe sickness and her health declined rapidly and then she was not so firm as she had been and your omit persuade her to anything and she became credulous and you could persuade her of anything and she thought she was going to die and her bodily health declined rapidly she was in vigorous health up to July in the year 1845 and then became weak though sometimes walked after that, after July in the year 1845 her health was better at times and she occasionally went about and resided at the offices of her Counsel the year before her death she became unable to collect her rents personally and got Witness to do it

2 To the 2d of said Interrogatories that in the second day of August in the year 1844 and afterwards the said Hannah Kelly Chase was possessed of both Real and personal property. She was possessed of ground rents to the amount of least three or four thousand dollars a year, Witness can run up to three thousand dollars a year in her fingers, she had a life estate in the House she lived in and owned Pennington in fee simple, it contained eight acres, and as her own purchase she had owned a good deal of Bank and other Stocks but she had parted with them before August in the year 1844 her income on August the 2d in the year 1844 was equal to three or four

thousand dollars and so continued. Witness thinks that her rents and profits generally became due every 6 months the most valuable of them falling due in August September and October, and the corresponding months, She received more than fifteen hundred dollars a year of rents from the property where she lived besides living rent free, The tenants were so punctual that it was unnecessary to call on them for payment a second time,

3 To the 3d of said Interrogatories, that she thinks her Mother Mrs Chase did not spend five hundred dollars a year, when Witness first knew her Mother lived with her every day her said Mother kept but one servant and was remarkably parsimonious,

4 To the 4 of said Interrogatories that Witness is the Mother of said William Chase Barney he lived nearly a year with his said grandmother Mrs Chase went sometime in 1844 or 1845 to their work to house keeping in Delaware and left his grandmother, In the opinion of his said grandmother the said William Chase Barney was very strong to her, he held the most unbounded influence over her he could persuade her at any time to part with her money, which is human being could do but himself she resisted by every means to obtain her property. His said grandmother extended him and took care of him, He could do any thing with her,

5 To the 5 of said Interrogatories That the said Hannah K Chase has often told Witness that William Chase Barney did exert such an influence over her, and the said William Chase Barney has told Witness that he could do as he pleased with his said grandmother, he has told the Witness that he could get his grandmother a five penny bit, and get a hundred dollars from her he has told Witness that he could then tell her that he could get money from his said grandmother, and he would then go into her room and come out with his hands full of money, Witness however thought it was proper to take the care of her Mother in her age and infirmity, and prevent her said son from imposing on her and her Mother and William Chase Barney knowing this did all in their power to prevent Witness from knowing when he obtained money from her, The said Hannah K Chase was too weak to resist him she would cry and tell Witness that she had parted with property to keep him that she would not do it again, William Chase Barney was the only one who could get money from her, when Witness offended, he would take her in a hack and carry her away to the Bank &c and obtain it from her, He used his influence to get from her her money Notes and property and then squandered what he got. He obtained from her nearly all her income and stocks and when that was insufficient he got her to give Notes perhaps to the amount of a thousand dollars perhaps Witness has also seen one bond