12th Interrogatory

What proportion of said land or how many acres of it, contain the big vein of coal of the Frostburg region?

Answer.

I made no calculation of the part containing the big vein of coal, but I made an estimate of the part that has no coal. And that portion I estimated at from two hundred and fifty to three hundred acres

"Question repeated"

And witness says if he is to answer accurately he prefers to make a calculation first

13th Interrogatory {the whole of said tract are underlaid with said great vein of coal?}

About how many acres of the tract of land that was originally underlaid with the great vein, before any of it was mined out

Answer I think there are nine hundred acres of coal

14th Interrogatory

In making your survey, did you make any examination to ascertain how much of the land contained the big vein of coal and have you marked on the map "D. D. Brown" any lines to show where the big vein lies; If so describe it on said plat

Answer.

I did make such examination. The blue line shows on the map the outcrop of the big vein

15th Interrogatory.

Describe what lines on the map will show where the big vein of coal is, in the property described in "Exhibit A."

Answer.

From the point on the map where the blue line crosses black line marked with the black figure one (1) then with the black lines marked with black figures 2. 3. 4. up to 12 where the blue line crosses 12.

16th Interrogatory

What is the value of the land described in said Exhibit A, exclusive of its worth as coal property?

Answer.

I think "The Vale" is worth thirty dollars an acre, the part of the Hoffman Farm between the road or west of the road leading from the Hoffman to the Eckhart mines is worth about the same. The balance of the property is valuable only for the timber that is upon it. I think this part ought to be worth twenty dollars per acre.

17th Interrogatory

What lines on the map "D. D. Brown" show "The Vale" or bound it?

Answer.

"The Vale" begins at the end of the black line marked 5, on the map and runs with the black line and the red dotted line

marked with the black figure 6 and the red figure 1. then with the red dotted lines marked with red figures 2. 3. 4. 5. 6. 7. 8. then with the black lines marked with figures black 3. 4. and 5. and red figures 9 and 10 and 11

18th Interrogatory

Mark on the plat "D. D. Brown" and describe which is the northeast corner of "The Vale" and also describe which are the easterly bounds of "The Vale"

Answer.

The North east corner of "The Vale" is at the end of the second line of the tract called "The Vale" and designated as such on the Plat

The easterly bounds of "The Vale" are the red dotted lines marked with red figures 3. 4. 5 and 6.

The witness being here examined on the part of the Respondents to cross interrogatories to him propounded deposed and said

1st Cross Interrogatory.

Do you know of how many tracts and parts of tracts, that which is commonly called the "Hoffman Farm" is composed?

Answer.

No. I do not

2nd Cross Interrogatory

Did you know or did you survey for the purpose of ascertaining the same, the boundaries of the several and various tracts commonly known as the "Hoffman Farm"

Answer.

I did not

3d Cross – Interrogatory

Before you made the survey you speak of did you call upon (or were you requested so to do) the surveyor employed by the Cumberland Coal and Iron Company, who originally laid off and surveyed the lands mentioned in said "Exhibit A" for the purpose of showing and pointing out the beginning thereof?

Answer.

I did not call upon him and was not solicited so to do.

4th Cross – Int.

In your answer to the fourth interrogatory in chief, you say that in order to ascertain the beginning of the land described in "Exhibit A" you went to a point shown to you as the North west corner of "The Hoffman Farm" State who showed you that point