Answer. I can not without making a calculation.

12th Interrogatory. Would a like difference of value exist in a similar parcel of land in proportion to the increased distance of it from market, for two miles, say what would be the difference of value between it and property situated as the Hoffman Mine Property is?

Answer. I should say without knowing the exact position of the Hoffman mine property, that the difference of value in both would be in proportion to their respective distances from market, according to the ratio indicated in my answer to the last previous interrogatory.

13th Interrogatory. Have you read Exhibits "A" & "B" of the bill in this cause – The first being deed of Hoffman Mine Property from Complainant to Sherman and Dean, and the other the transportation contract between the same parties?

Answer. I have.

14th Interrogatory. So long as any marketable coal remained in the Hoffman Mine property and the rights, privileges and benefits of said transportation contract could be enjoyed by the owners of said property and coal, would you, if the owner thereof, exchange the same for any other coal property of the whole coal region, containing a similar quantity of marketable coal?

Answer. I would not exchange quantity for quantity for any other coal land in the region.

15th Interrogatory. Would you exchange it for any other coal property in said region, containing twice the quantity of marketable coal remaining in said Hoffman Mine property?

Answer. I think I could select a tract of land twice the quantity of which I would prefer to the Hoffman property, even with the advantage of the transportation contract.

16th Interrogatory. Is there any coal property in Allegany County, from which coal can be sent to market, at as much profit as from said Hoffman Mine property, under said transportation contract.

Answer. I think not.

17th Interrogatory. What, in your experience, is the greatest number of tons of coal which can be taken out of one mine opening, per day, with the greatest economy?

Answer. A single tract opening – from three hundred to three hundred and fifty tons per day.

18th Interrogatory. Does the quantity of coal taken out of one mine opening per day, affect the air in the mine, and if so how?

Answer. The greater the quantity removed from a mine per day, the greater the quantity of fresh air is required.

19th Interrogatory. Do you consider it practicable to take out of any one mine opening, seven hundred tons of coal per day?

Answer. I should think it would be very difficult to obtain that quantity, if not impossible, from a single tract opening.

20th Interrogatory. Would it not be extremely difficult

to ventilate a mine property, for a regular business of seven hundred tons per day, taken out of it?

Answer. I dont know that it would. It would require more ventilation than for half that quantity.

21st Interrogatory. Supposing that the indebtedness of Complainant at the time of the sale of the property by it to Sherman and Dean, was six hundred and fifty thousand dollars – from your knowledge of the location of all coal lands of Complainant and the relative distances from market could it have paid said debt from sale of all its coal lands, if it had sold them at such rate of price and with same privileges and prices of transportation, as to enable the purchaser thereof to put the coal into market as cheaply as the owners of Hoffman could under said sale and transportation Contract?

Answer. I can't answer the question as it reads, I would say, if it is intended to make all the purchasers equal in the price at which the land is sold, it would not pay that amount of indebtedness.

22nd What would be the value of the coal land, of the Company, which is most distant from market, if the same were sold at such a price as would enable the purchasers thereof, to put the coal from it in market, as cheaply as the Hoffman mine property proprietor can, under their purchase and transportation contract – said purchasers paying the same rates of transportation per mile as are fixed in said transportation contract? assuming, said Hoffman mine property to be twelve miles from Cumberland and thirteen miles from the Canal wharf?

Answer. I can't answer without going into extensive calculations.

This witness being here cross examined by Respondents counsel and said

1st Cross – Interrogatory. In point of fact, have not the coal lands of the Georges Creek valley, farther from Cumberland, been sold for higher average prices per acre, than those in the Frostburg region?

Answer. I dont know that I remember, any prices per acre of lands sold in the Georges Creek Valley.

2nd Cross – Interrogatory. Have you any knowledge of the sales of any coal lands in the Frostburg region, since 1854, except the one in question, in this case?

Answer. I know of no other sales than the Hoffman property, and the Hard property since 1854, which latter was purchased by the Borden Mining Company.

3rd Cross Interrogatory. Have you any knowledge of any Company or individual, mining coal in Allegany County which has ever mined and sent to market as much as three