Answer: I have known that District of Country very intimately for twenty five years having visited nearly every House in that District of Country respectably and from time to time conversed with most of the owners in regard to their particular tracts of Land.

Question. Did you knowledge of the circumstances of Mrs. Charlotte Withers and her children residing with her previous to the time when the defendent Hammond undertook the trust in question, if so what were they and what were your means and opportunities of knowledge

Answer. I have known Mrs. Withers and family for about 20 years and have been somewhat familiar with the circumstances from about the year 1848 when I come to know their financial affairs by Edwin Withers making application to me to relieve them of some pecuniary difficulty about that Mr. Blackburn I think was trustee for Mr. Ward offered their property for sale the family were in very great straight, at the request of Edwin I called on his Mother and Sisters to explain to them the real difficulty in which they were as to their property and at their urgent request tried to get Mr. Ward to postpone the sale which he refused, when the sale had taken place I again called to see Mrs. Withers and family letting them as my opinion that the only thing they could do to secure an interest in the property was to endeavor to hinder the ratification of the sale, urging them instantly to employ counsel to do it, which they did and the sale was not ratified Edwin Withers immediately after that with his Brother and other members of the family urged me to try and help them out of their difficulty I told them that there was only one thing that could be done which was to appoint a Trustee, with full powers to dispose of their property and to sell it in Lots, that they would have to get some one who could raise the money at once and wait on the sale for his money, as Mr. Hiss who had bought the property had purchased up the Judgments against it, and had them actually offered for sale under one of them. Mr. Michael Withers and Edwin Withers both stated to me that this was their own opinion and that they had resolved immediately to have a Deed prepared to carry it into effect.

Question, had you or not at the instance of Mr. Edwin Withers or his mother or other members of their family endeavored to find some persons having the requisite capital to assist them.

Answer Mrs. Withers. Edwin and his two sisters said they had no Friend they could go to unless I would engage to do it. I told them it was out of my power to do that I could not engage in such business, After the delay of a few days Edwin and I think his Brother Michael came to me still urging that I would do it, feeling interested in them and desirous of helping them in their trouble I told them if my nephew who was then a student at Law with Messrs Brown & Brune would undertake to attend to the business

I would raise the money and become his security to which they most heartily assented and the Deed was drawn up which was examined and approved by Mr. Brown but not being executed at the time appointed I enquired of Mr. Edwin Withers why, and received for answer that through Mr Hill (Mr. B. Hill I believe his) he had succeeded in getting Mr. Adam Hammond to lend them the money for thirty day to pay the first Judgment.

Adjourned to meet again at 6 o'clk P. M.

Andrew B. Cross being now crossed examined for the Complainants Deposes & says

Question, was there not a good deal of excitement in Baltimore City in October last year by the passage of troops thought from different parts of the north on their way to the South

Answer I dont recollect in October from that cause or from or from any cause.

Question; you say the holders of Land adjacent to the Withers property were present at the sale give the names of such persons as were present

Answer, on the East of this property and adjoining were Daniel Slater, on the north and West John McCubbin and Mr. Buzzy, Mr. Cameron at Walkers Mill, Mr. Bentley and his Father in Law Mr. Latty, Mr. Turner. Mr Downs I think was also one of them and a Mr. Sampson who also adjoins on the North I think Mr. Wally Walker was there, in addition to that there were others from within a mile or two

Question; who within a mile or two were present

Answer The names of the persons I cannot at this time identify but I recollect distinctly that there were men from the neighborhood of Gorsuchs Mill from the neighborhood of Hod Fachers Mill, I think Mr. Benton who adjoins the Parkton property was present

Question; You know all the Land owners within two or three miles of this property.

Answer, I know most of them

Question. You are a minister of the Gospel and have been so for 27 years I believe

Answer I am

Question. have you been in that Neighborhood on the mission and if so for that length of time

Answer, most of the time since 1837

Question; are you not as familiar with the Land owners within two a three miles of the Withers Property as with those adjoining it.

Answer With some of them much more so.

Question; are there any Land owners within two a three miles