Charles E. Coffin } In the Circuit Court for
vs } Prince Georges County sitting in
John D. Satchford } Equity

Defendants additional Interrogatories

1st Have you or not any Knowledge at what time the road in controversy was made, laid out or first opened and by what person or persons it was made laid out or opened? If yea: State all the information you possess upon the subject and how you derived your Knowledge?

2 Have you or not any Knowledge to what purposes the road in controversy was applied and by whom it was principally used? If yea, State all the information you possess upon this subject and how you derived your Knowledge.

3 Have you or not any Knowledge that the road in controversy was ever repaired or kept up at the public expense or what repairs if any were done to it and by whom? If yea, State all the information you have upon this subject.

4th Have you or not any Knowledge that there are any other roads by which the Complainant can haul ore from his and others banks other than the road in controversy? If yea, State how many and how far distant each of them are from the Complainants furnace and their present condition whether passable or impassable by wagon and how long they have been in this condition.

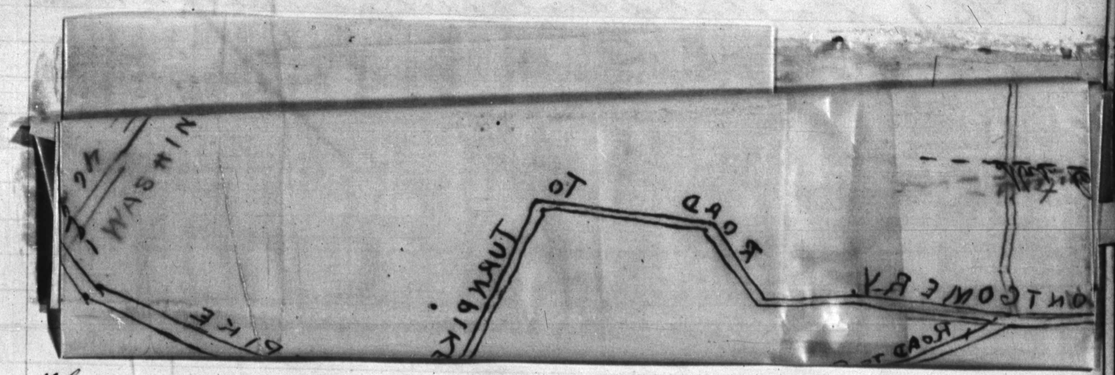
5 Have you or not any Knowledge of the condition of John D. Satchford's land over which the road in controversy passes at the time of his purchase? If yea State whether there were any other roads over it other than the one in controversy and how many and by whom they and each of them were made State fully and particularly all your Knowledge upon that subject.

6th Have you or not any Knowledge of the distance from the 21st Mile stone on the Baltimore & Washington Turnpike Road over the Road in controversy to the complaimants ore banks or the distance by any other route from the Complainants furnace to his ore bank If yea, State the distance of each of said routes and how you derived your information.

7th Have you or not any Knowledge of any custom existing among iron ore miners in relation to the use of their roads by the public? If yea, state how long said custom has existed and to what extent the public have been permitted to use said roads and have

they or not been at all times open to the public for all sorts of travelling by wagons or otherwise.

Shelby Clark &
W. G. Stephen
Sol. for Respondent.



This will certify that I have surveyed and measured the distance of the road from Muirkirk furnace to the 21st Mile stone on the Washington Turnpike and from said Milestone through Mr. J. D. Satchfords farm to Mr. Coffins ore Banks, and from Mr. Coffins Banks by way of Reese's outlet to the old Marlborough Road leading from the old Iron works to the Washington Turnpike, and with said Road and Turnpike the to the said Milestone above named and find the distance to be as below stated.

From the furnace to 21st milestone on the Washington Turnpike 222rds 3/4m less 18 rods and from 21st Milestone through Mr Satchfords to Mr Coffin Banks 322rds or 1m 2 rods and Mr Coffins Banks by way of Reese's outlet old Montg. Road and Washington turnpike to 21st Milestone 528rds or 1/2 Miles. 48 rods showing a difference in the two roads of one half a mile and 46 rods.

320 rods = 1 mile
160 " = 1/2 "
80 " = 1/4 "

Jno. P. Edmonston

May 30th 1867.

On the same day, to wit: the Eighteenth day of July in the year Eighteen hundred and sixty seven the defendants by his solicitors aforesaid filed in Court here the following exceptions, to wit:

Charles E. Coffin } No. 556 Equity Bill in Equity
vs
John D. Satchford }

Exceptions to the sufficiency of the averments of the Bill

1. The bill does not sufficiently allege that the damage