April Term 1868

The commission was then adjourned to the 9th day of February in the same year, at eleven in the forenoon, and the same place, at which last mentioned time and place the commission met pursuant to notice, and I proceeded in presence of the Solicitors of the respective parties, to take the following depositions, that is to say.

Alexander Moore, a witness of lawful age produced on behalf of the Complainant, being by me first duly sworn on the Holy Evangely of Almighty God being examined on the following interrogatories to him propounded in that behalf, makes oath deposeth and saith as follows. that is to say.

First Interrogatory

Do you know the parties to this suit, and Robert M. Chatterton, and do you know the land now in dispute

1. Answer. "I have known the several persons enquired of about 3 years, and have known the land all my life. I reside in Baltimore County and am a farmer, and now reside about a mile from the said place."

Second Interrogatory

Who resides there now, and how long have they resided there

2. Answer. "Robert M. Chatterton, and his wife and family have resided there for the last 3 years to the best of my knowledge, John Chatterton is there backwards, and forwards."

Third Interrogatory

State who manages and seems to be proprietor of said farm.

April Term 1868

3 Answer "I think it is Robert M. Chatterton

(Question and answer objected to by Defendant Solicitor)

Fourth Interrogatory

Who has possession of the house, and who has conducted the household affairs for the last 2 or 3 years.

4 Answer "I think that Robert M. Chatterton and his wife have had the possession of the house, and she seems to have the conduct of the affairs of the house"

Fifth Interrogatory

State any acts of possession or ownership by Mrs Josephine Chatterton, the Complainant, within the last 2 years

5. Answer "I have seen her working and attending to her affairs in the house and garden just as if they were her own and her husband too (she told me that the place was hers, and she had paid for it)

(The passage in brackets is objected to by Defendants Solicitor)

Sixth Interrogatory

Have you worked upon the farm, and when, and how long ago, and who employed you,

6. Answer. "This last year I worked there, and I put in the Crop, it was in 1862, and Mrs Josephine Chatterton, the Complainant employed me, I worked the place on shares."

Cross Examined for Defendant.

First Cross Interrogatory

Does not John Chatterton live on the same property and occupy part of the house.