Fifth Interrogatory. Was or not the consideration mentioned in the deed of which you have spoken, of one thousand dollars the real consideration for the execution of said instrument?

Answer. It was not the consideration mentioned was nominal merely, no money whatever passed. The object of the transaction as I have already stated, was to secure Mrs Susan Groff a home in case of the death of her husband Abraham.

6th Interrogatory. What was your business in the year 1858?

Answer. A farmer and surveyor, and I have been in the habit of writing instruments of writing, such as conveyances wills &c, for neighbors when applied to and of giving them such advice in regard to their affairs as my own common sense and knowledge of men and affairs derived from long experience enable me to.

Examination of witness for Complt closed

Arnon Richards, cross examined on behalf of Defendant

I was familiar with Abraham Groff and was in his company frequently. I thought his character was unexceptional. I was brought in contact with him because of my doing work on lands which they purchased when they came from Pennsylvania into Maryland. So far as I knew Mr Groff and had opportunity to know him, my judgment was and is now that he was not a man to be easily influenced. He seemed to me to be a man who would be decisive in accomplishing and executing his own purposes and stedfast and unwavering.

He both belonged to the same religious communities. That was the opinion I formed of him.

I surveyed the tract of all the land he owned there, and by his direction I then run lines across the tract to cut off the part that has on it the buildings. He stated to me that his purpose was to convey the part on which the tenements were to his wife. He wanted her to have the homestead.

I prepared the deed executed by him according to his instructions and I read it to him before he executed it and he said it was what he wanted.

It was an open, free, deliberate affair. There was nothing in it smothered up. At first he wanted me to write a deed from him to her of the property. But I told him it could not be legally done. But I told him if he wished Mrs Groff to have it for her benefit he could convey it to some friend, and that friend could convey it to her. And I told him I thought the title would be good. He made the inquiry if she should die before him, what would become of the property then. I told him she had the power under the Rate laws to make her last Will and

testament, and that she could give it to whom she pleased. They then instructed me to prepare the deed and to prepare the Will. The Will was to be so prepared as to give the property to him for his natural life and at his death to her son Edwin Pelrer. This instruction was given in the presence of Mr Groff.

I told them the day that I would have the papers ready and told them that I could have the witnesses at my house, and that there was a magistrate close by, and on the day appointed they drove up to my house, and these papers were duly executed.

I walked with them to the carriage when they were about to depart and they both expressed themselves gratified and pleased with the arrangement. The old lady with tears in her eyes said that she would now have a house and a home.

The deed and Will were read to both these parties before their execution of them, and upon the occasion of their coming to my house to execute them as I have already stated.

I remember that it was said by the old man that he had used moneys of the old lady, and that she had signed away her rights in property and that in consideration of these things, he desired to secure to her this home in her old age.

This was talked over between them at the time these transactions occurred.

Examination of the witness here closed.

Nimrod Lloyd. On behalf of the Complainant. I am a farmer, fifty ultra years of age, and reside in Baltimore County adjoining the residence of Mr Abraham Groff. I knew Abraham Groff in his life time and knew him eight or nine years. In April A.D. 1859 I resided on property near Pleasantville on the Deerwood. He had a family composed of his wife, himself, his wife's sister and his wife's son Edwin Pelrer. His wife's name was Susan Groff. I knew nothing of the treatment of Abraham Groff by his wife Susan and Edwin Pelrer of my personal knowledge I only know what Abraham Groff told me.

Interog. State what Abraham Groff told you as to the treatment he received at the hands of these parties.

Question objected to by Deft.

Answer. I think sometime in A.D. 1858 he told me he was not treated right, or something to that effect. He said that there were opperate sugar dishes on the table, that he had taken out of the brown sugar and Edwin out of the white sugar. I asked him why he put up with treatment of that kind. This is the sum and substance of what he told me I believe. Abraham Groff was at this time seventy five years of age I should suppose. I do not recollect what he told me his age. He complained of