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Interrogatories put to Mrs. Diggs this 28. June 1821. and her answers thereto

1st. Interrogatory. Are you acquainted with the several persons named in the commission viz. Complainants & Defendants? with which of them? How long have you known them?

Answer. I knew all of them, and have known them a long time.

2nd. Int. In what year died the late Ignatius Diggs of Prince George County dec.d what children did he leave? & to whom was his daughter married?

Answer. Ignatius Diggs died in the year 1785. left one child, a daughter - she was married to Thomas Sim Lee.

3rd. Int. Have you any knowledge of any sums of money having been advanced by the said Ignatius Diggs to his son in law Thomas Sim Lee? for what purpose? and for whose benefit? at what time? and what sum?

Answer. She hath knowledge of a certain sum of money that was advanced by Ignatius Diggs to Thomas Sim Lee for the purpose of purchasing land near George Town out of which land Mr. Lee was to make over to Mrs. Lee an equivalent for the money thus advanced - for the benefit of Mrs. Lee. she does not know the sum advanced, nor the precise time. She was a witness to a writing in which Mr. Lee agreed to make good the advance as above stated - and that she found the writing to which she saw her own signature affixed as a witness in the desk of the Revd. Mr. Thomas Diggs - many years after the death of Mr. Ignatius Diggs and some time after the death of both the Revd. Mr. Diggs and Mrs. Lee and that believing it was of no consequence after the

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Answers filed Oct. 28. 1821.

Defendants Exhibit

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Defendants Counsel Exhibit to be handed to Complainants Solicitor

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MdHS 1974 [1299-1070]