

1st Question by Plaintiff's attorney:

State your Age, Residence and Occupation?

Answer:

I am 35 years old, reside in Petersburg, Virginia and work at a tobacco factory as a laborer.

2nd Question by Plaintiff's attorney:

Are you acquainted with the plaintiff and defendant in this suit, if yea, please state how you have know them respectively?

Answer:

I have known Richard Green about two years and I have known Henrietta Green since the fall of 1885.

3rd Question by Plaintiff's attorney:

Do you know of any act of adultery committed by the defendant Henrietta Green? If yea, please state when, where and with whom and give full particulars of what you may know.

Answer:

One night in December 1885, as I was coming along Poterville Street, I met with Richard Green, who stopped me, and told me that his wife had gone in a house near by, which was the house in which Henrietta once lived in company with Davy Perry. I went to the house and looked through a crack and saw Henrietta Green and Davy Perry both undressed and getting into the bed together.

4th Question by Plaintiff's attorney:

Were you a witness in the case of the *Commonwealth vs. Henrietta Green and David Perry* tried before the Mayor of the City of Petersburg in December 1885?

Answer:

I was, and gave in my evidence at the trial of both of them.

5th Question by Plaintiff's attorney:

Were the Plaintiff Richard Green and his wife living together as man and wife at the time referred to in question 3?

Answer:

No sir. He had previously left her on account of his bad doings, and he has not lived with her since. Richard Green has most of the time since worked and lived out of the City.

And further this deponent-said not-his (Joseph N. Evidence) which was marked