

1) Please state your name, age, residence and business
2) Please state whether or not you knew Rev. John H. Birchhead during his life time, and if so at what times you knew him and what was his apparent age at that time.

3) State whether or not you ever signed his will, and if so state the circumstances of same.

4) In answer to the next preceding interrogatory, you state you signed such a will as witness, then state whether in your opinion the testator was of sound mind and whether or not in your opinion he knew and understood the contents of the will, and whether or not at said time he was of the age of twenty-one years.

5) In answer to the foregoing interrogatories you state you signed such a will, then state whether you signed the same in the presence of the said John H. Birchhead and at his request, and whether or not there were other witnesses to his signature, and if so whether or not you signed same as witness in their presence.

6) Is the instrument attached the will which you signed, and is the signature of W. S. Stewart your signature?

Filed this 30 day of Dec., A. D. 1908

Frank R. Newton
Clerk County Court, Bexar County, Texas

State of Texas In the County Court, Bexar County, Texas
County of Bexar March Term, A. D. 1909

In the Estate of John H. Birchhead, deceased.

To all persons interested in the above Estate: Greeting:
You will take notice, that five days after the filing of these interrogatories they will be forwarded to the County of Matagorda, there to be answered by the person named herein as a witness to the will of John H. Birchhead deceased.

Interrogatories propounded to W. S. Stewart by Theodore G. Lambrell named in the will of John H. Birchhead, deceased, as executor thereof;

1) Please state your name, age, residence and business.

2) Please state whether or not you knew Rev. John H. Birchhead during his life time, and if so at what times you knew him and what was his apparent age at that time.

3) State whether or not you ever signed his will, and if so state the circumstances of same?

4) In answer to the next preceding interrogatory, you state you signed such a will as witness, then state whether in your opinion the testator was of sound mind and whether or not in your opinion he knew and understood the contents of the will, and whether or not at said time he was of the age of twenty-one years.

5) In answer to the foregoing interrogatories you state you signed such a will, then state whether you signed the same in the presence of the said John H. Birchhead and at his request, and whether or not there were other witnesses to his signature, and if so whether or not you signed same as witness in their presence.

6) Is the instrument attached the will which you signed and is the signature of W. S. Stewart your signature?

Filed this 30 day of Dec. A. D. 1908

Frank R. Newton
Clerk County Court, Bexar County, Texas

-Certificate:-

The State of Texas
County of Bexar I, Frank R. Newton, Clerk of the County Court of Bexar County, Texas do hereby certify that the foregoing is a true and correct copy of the Interrogatories to be propounded to W. S. Culver, A. S. (A) Stewart and W. S. Stewart in the Matter of the Estate of John H. Birchhead, deceased, as the same appear on file in my office.
In testimony Whereof, I witness my hand and official seal, at office in San Antonio, Texas, this 5th day of January, A. D. 1909

(Seal) Frank R. Newton
Clerk County Court, Bexar County, Texas

The State of Texas

To the Clerk of the District Court, Judge or Clerk of the County Court, or any Notary Public, in and for the County of Matagorda State of Texas: Greeting.

We hereby authorize and require you, or either of you, to summon W. S. Culver, A. S. (A) Stewart and W. S. Stewart, residents of your County, to come before you forthwith, and that you then and there carefully and fully examine them upon his oath, first to be taken before you, touching the annexed Interrogatories:

1) That you reduce their answers, so taken, to writing in proper form, and cause the same to be subscribed and sworn to by said witnesses.

2) That you certify, under your hand and seal of office, that said answers were such as to be subscribed before you by said witnesses.

3) That you place an envelope to the answers so taken, together with the annexed Interrogatories, and this commission, with your name across the seal.

4) That you endorse on the envelope the names of the parties to the writ, and the names of said witnesses.

5) That you direct the package to the "Clerk of the County Court of Bexar County, San Antonio, Texas"

6) That if said package is sent by mail, you shall endorse thereon that you deposited this package containing the deposition in the Post Office at

State of _____ in person, on the _____ day of _____ A. D. 1909

and sign your name thereto officially, or if you entrust it to private conveyance, as provided by the statute, you will apprise the person receiving it that it must be delivered to the Clerk of this Court by himself in person.

which evidence, so taken as above, is to be used on the trial of a suit now pending in the County Court of Bexar County, in said State of Texas wherein an application is pending to probate the will of John H. Birchhead deceased, No. 5125.

Herein fail Not, but make due return of this writ, as the law directs.

In testimony my hand and seal of office, at San Antonio, Texas, this 5th day of January, A. D. 1909.

(Seal) Frank R. Newton Clerk

Co. Court, Bexar County, Texas

Estate of John H. Birchhead In County Court of Bexar County, Texas

March Term, A. D. 1909

The State of Texas
County of Matagorda

By authority of the annexed commission issued by the Clerk of the County Court of Bexar County, Texas.

In the case of the Estate of John H. Birchhead pending in said Court, I caused the witness W. S. Culver to come before me, who being by me duly sworn to speak the truth, the whole truth and nothing but the truth