

ALL COMMUNICATIONS TO BE ADDRESSED
TO THE COMPANY AND NOT TO INDIVIDUALS

QUOTATIONS SUBJECT TO CHANGE
WITHOUT NOTICE



SHELL PETROLEUM CORPORATION

SHELL BUILDING

ST. LOUIS, MO.

CABLE ADDRESS
SHELPEXCO ST. LOUIS

4261

SHELL BUILDING
HOUSTON, TEXAS

April 30, 1935

IN RE: SAN JACINTO COUNTY TEXAS
SHEPPARD AREA

Honorable J. H. Walker
Commissioner of General Land Office
Austin, Texas

Dear Sir:

At the request of Mr. Anson Feagin, we are transmitting herewith under personal cover photostat copies of all enclosures in file 52, District Court of San Jacinto County, Texas, for the March Term 1873, styled William Taylor vs. Matthew Vickery.

If we can be of further service to you in the matter please be sure to let us know. In the meantime with best wishes, we are

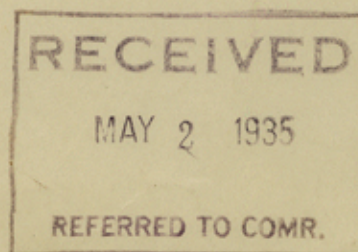
Yours very truly,

SHELL PETROLEUM CORPORATION

By *[Signature]*
Land Manager

TVC:lwn

File No. Sketch File 22
San Jacinto County
Court Papers from Shell ~~Oil~~ Petroleum - SF-13387
Filed 19 35
GARRY MAURO, Com'r
By Douglas Howard (12-31-1935)



counter 35734

ALL COMMUNICATIONS TO BE ADDRESSED TO THE COMPANY AND NOT TO INDIVIDUALS

QUOTATIONS SUBJECT TO CHANGE WITHOUT NOTICE

CABLE ADDRESS SHELPETCO ST. LOUIS

4309



SHELL PETROLEUM CORPORATION

SHELL BUILDING
St. Louis, Mo.

SHELL BUILDING
HOUSTON, TEXAS

May 7, 1935

RE: SAN JACINTO COUNTY TEXAS
SHEPHERD AREA

Hon. J. H. Walker, Commissioner,
General Land Office,
Austin, Texas.

Dear Mr. Walker:-

We are enclosing herewith photostat copy of deposition by W. H. Beazley, M.D., Stephen Yates and Frederick Randolph, in the case of B. F. Lewis et al vs. J. R. Rucker et al in the District Court of San Jacinto County, Texas, before B. F. Ellis, a Notary Public, on September 16, 1904.

If we can be of further service to you please be sure to let us know.

Yours very truly,

SHELL PETROLEUM CORPORATION

BY

Land Manager

TVC:IK

File No. Sketch File 22
San Jacinto County
Court Papers from Shell Petroleum - SF-13387
Filed 19 35
By GARRY MAURO, Com'r
Douglas Howard (12-31-1990)

RECEIVED

MAY 9 1935

REFERRED TO School

counter 35735

Fee \$7.50 paid by H. C. Shindler

State of Texas 3
County of San Jacinto

In compliance with the
annoyed commission to take the deposition of
W. H. Beazley M.D. of San Jacinto County, Tex as
a witness in the case of J. P. Lewis et al. vs
J. B. Bunker et al. in the District Court of
San Jacinto County, I caused the witness Frederick
Randolph to appear before me in the town of
Shepherd in said County and having read said
interrogatories to him and caused him to answer
same and reduced his said answers to writing
and then read the answers to him and caused
him to sign same and swear to the truth
of same.

B. F. Eccles County Public
San Jacinto Co Texas

To the 1st Interrogatory the witness answers
I am 67 years of age & in 1843 was living
with Col H Washington on his plantation on
the Trinity River in what is now San Jacinto Co
Texas

I was well acquainted with Col Washington
during that time, he was my uncle
To the 3rd Interrogatory

I was well acquainted with Charles
Taylor I first met him on Col Washington's
plantation about 1843 where I frequently
met him until during the Civil War & I also
met him at his home in Nacogdoches some
times I am not related to Charles Taylor

1 Col Washington was my Uncle he is now
2 dead & died the 8 of June 1868
3 To the 4th Dist

4 From 1843 to 1862 Col Washington lived
5 on his plantation on Trinity River on the
6 Logan League of land in what is now
7 San Jacinto Co. From 1843 until the civil
8 war began in 1861 I lived with Col Washington
9 on his plantation. At the time mentioned
10 he lived on the Logan League of land in
11 what is now San Jacinto Co. He had lived
12 there 3 years previous to 1843 & he continued
13 to live there until his death in 1868

14 Because I live with him as a member of
15 his family till the commencement of the war
16 To the 5th Dist

17 I am acquainted with the location
18 on the ground of Martiney League No 4.
19 In conjunction with Col Washington & working
20 for him I helped to erect a saw mill on the
21 west end of this League of land in 1856
22 & remained at said mill about two or three
23 years. Col Washington erected this mill
24 with the consent Judge Charo & Taylor
25 who claimed the Martiney League No 4.
26 I claim now to own about 80 acres
27 of said League of land. I purchased
28 this interest about 1875 & have used the
29 same continuously ever since in actual
30 possession a large portion of it being
31 enclosed by fence & in constant cultivation
32 except one year & then enclosed.

As already stated from 1843 until 1861
I lived with Col Washington on the Logan
League excepting about two years spent
by me at the Saw mill on League No 4.
Col Washingtons place of Residence was about
600 yards north of the north line of Martiney
League No 4
To the 6th Dist

As before stated & resided with Col
Washington during the time inquired about
& was familiar with the occupation by him
of Martiney League No 4.
On the eastern portion of the league there was
a field commonly known as the Daws
field which was occupied & cultivated by
Gen Daws in 1842 & 1843. Col Washington
took possession of this field in 1844 as the
Agent of Judge Chas S Taylor who claimed
the entire Martiney League No 4 & could
mind to occupy & cultivate said field
as the Agt of Judge Taylor continuously
& without interruption until 1862
when Judge Taylor sold that portion of the
League including improvements. In
addition to this there was an occupation
on the west end of the league by Col
Washington by the erection & operation of
a Saw mill from 1854 until 1861
To the 7th Dist

As before stated the land was held
actually occupied & cultivated every year
from 1844 to 1862 by Col Washington

4
1 as the Agent of Chas S Taylor. The nature
2 of the occupation was the actual cultivation
3 from year to year of about 30 or 35 acres of
4 land enclosed & known as The Davis
5 field & by the operation of the saw mill
6 on the west end as before stated.

7 The improvements on the land consisted of
8 the field & saw mill as before stated.

9 Judge Chas S Taylor was the party claim-
10 ing the League of land & Col Washington
11 was his Agent & Tenant. After 1862
12 Col Washington continued to occupy & cultivate
13 the improved land. After that Col W B
14 Deussen occupied it until about 1884
15 & since that time my Brother John Bradley
16 has owned the land including the mill
17 & has continuously used & cul-
18 tivated the same until 1903 when it
19 was not cultivated but fences kept up &
20 rented as a pasture. & 50 acres as before
21 stated has been occupied & cultivated by
22 my self.

23 To the 8th Inst

24 I know of my own personal
25 knowledge that Col Washington was from
26 about 1843 or 1844 until 1862 the
27 agent & Tenant of Chas S Taylor with
28 reference to said Marling League
29 No. 4. I know the fact by association
30 & conversation with both Col Washington
31 & Judge Taylor during the existence of
32 such relationship. Col Washington

1 died on June 8th 1868 on his plantation.

2 Judge Taylor during the time upon
3 and about claimed to own the said
4 Martin's League No 4. I know this
5 from having seen his deed & frequently
6 heard him speak of it.

To the 9th Ind

8 I am acquainted with the three
9 yards named & have known them all
10 my life & know they live in the
11 neighborhood of said land since
12 about 1842. They all belonged to Col
13 Washington as slaves before the war

To the 10th Ind

15 I have stated fully in my previous
16 answers the particulars of the possession
17 of said League No 4 by Col Washington as
18 the Agent & Servant of Taylor & also of
19 the possession of portions of said League
20 by W H Beasley & John Beasley

23 To the Cross Interrogatories The witness answers
24 To the 1st Ind

25 From 1840 until the war began I live
26 with Col Washington & during the war I
27 served 4 years & three months in the Army
28 from 1865 to 1867 I resided in New Orleans
29 as a medical student from 1867 till 1869
30 I practiced medicine in Harris Co
31 from then until 1878 & resided in San Jacinto in
32 the practice of medicine from 1878 to 1885

6
I practiced medicine in the city of Houston
since which time I have resided in
Sanjacento in the practice of medicine
To the 4th Ind^{mt}

I knew nothing of Charles Taylor
during the time inquired about I was
not born till 1837

To the 3rd Ind^{mt}

I am absolutely positive about
the matters that I have testified about
as they are matters of my personal know
ledge + which I distinctly remember.
I have a good memory of events which
have occurred within my knowledge
during the times inquired about.

I was no way interested in Taylor
affairs I was in Cal Washington was
being his Nephew + a member of the
family. I was seven years old in 1843
+ 25 years old in 1862. I have not stated
that I forgot other things than the martiny
land matters inquired about

To the 4th Ind^{mt}

my first recollection of actual occupancy
of Martiny League No 4 was by Gen Davis
about 1843 + then the only other occu
pency was by Col Washington as the Agent
of Judge Taylor as I have fully stated.

Davis with his negroes cleared the land
known as the Davis piece + Col Washington
afterwards occupied it. Washington in 1856
erected a sawmill on the ~~part~~^{west} end as I

have fully stated. I make these statements
because of my personal knowledge of
the matter.

To the 5th Dist

I know of the tenancy of Washington
under Taylor because of conversation
had with both Washington & Taylor.

I have followed the north south &
east lines of Marley League No 4
I have followed the north & south
lines of the League by actual survey
running the south line of the Logan
League & the north line of Marley
League No 3. about 1875 or 1876
League No 4 is bounded by the Logan
League on the north Hardin League on
the west Marley No 3 on the south &
Trinity River on the east. I cannot
give the length of the line.

About 30 acres under fence & in culti-
vation on the east end of the League.

about 10 acres under fence on the
west end including the mill. There was
also a pasture on east end of League
containing about 400 acres, this was
fenced by Col Washington about 1852
& maintained until about 1869
all fences were constructed by rails
The fence has remained around the 30
acres from about 1842 until the present
time. The pasture fence was removed
about 1869. I have stated where the

8
improvement were on the survey & what
surveys bounded League No 4
To the 6th & Int

I know that he claimed all of
League No 4 & my understanding is
that he owned all of the eleven tracts
League in conjunction with other parties.

My understanding is that at an early
date there was a partition of the
eleven Leagues between Taylor & the
other owners in which the whole of
League No 4 was given to Taylor.

To the 7th & Int

I have stated that Col Washington
was the Ayt & Tenant of Charles S. Taylor
from 1843 or 1844 to 1862 I know
this to be a fact because of my living
with Col Washington during that time
and my intimacy with the business affairs
as between himself & Judge Taylor. It
is a fact that I never heard a contract
detailed between them so far as I remember.

I have explained why I remember the
facts testified about. Col Washington
did not claim this land as his own
until 1862 when he bought a portion
of it.

To the 8th & Int

No data has been furnished me
I have furnished other parties with the
data. I have talked to Robt C Shindler
several times & to his atty twice relative

to this land. my last conversation was
today with his attorney while discussing
these interrogatories

To the 9th Inst

I W Blount atty for B C Shuckler
The Notary & one unknown person
at the notary's house. I have no
data at all only my knowledge &
recollections of the facts

W. H. Beasley. M.D.

The above answers to the direct and cross
interrogatories hereto attached read to
the witness ^{W. H. Beasley} and by him subscribed
and sworn to before me the
16th day of September 1904 - In
testimony of which witness my
hand and seal of office this Sept
16th 1904

B. F. Allen Notary Public
San Antonio, Tex

State of Texas
County of San Jacinto

3

In compliance with the
annoyed Commission to take the depositions of
Stephen Gates of San Jacinto County, Texas, a
witness in the case of D. P. Lewis et. al. vs
J. R. Proctor et. al. in the District Court of San Jacinto
County, I caused the witness Stephen Gates to
appear before me in the town of Shepherd in
said County and having read said interrogatories
to him and caused him to answer same and
reduced his said answer to writing and then
read the answer to him and caused him
to sign same and swear to the truth of
same

B. H. Ellis Notary Public
San Jacinto Co. Tex

To the 1st Interrogatory the witness answers
I am 66 years old I came to Texas
in 1840 when I was 7 years old & lived on
Col Washington's plantation on the Trinity
River in what is now San Jacinto Co.
I was a slave & belonged to Col Washington
& lived with him from 1840 until his
death in 1868.

To the 2nd Interrogatory

I resided with Col Washington on what
is known as the Loyal League of land
on the Trinity River in the eastern portion
of what is now San Jacinto Co. I never
resided on Martins League No 4 but as I

understand it that League is south of
and joins the Loyal League on which
Col Washington lived. I knew where the
south line of the Loyal League was on the
ground & Col Washington's residence was
about 300 yards north of this league line
& as I understand the land south of that
line was Martiney League No 4.

To the 3rd Int -

I knew Col Washington well, he was
my master from 1840 until 1865 I lived
with him during all that time, during
most of the time I was his body servant
To the 3rd Int -

I knew Judge Chas Taylor who lived
at Nacogdoches I became acquainted
with him at Col Washington's place where
I frequently saw him from the time I
was a child until during the Civil war
I understood at the time from conversation
with Col Washington that Judge Taylor
claimed the Martiney Land adjoining
the Loyal & I understood from him that
he held the Martiney land for Judge Taylor
To the 4th Int -

There was a field on the Martiney League
No 4 as I understand it about one half
mile south of Col Washington's place
which field was commonly known as the
Davis place & Col Washington occupied &
cultivated this field from the time
Davis left it about 1844 every year until

some time during the civil war
during all this time the field was cultivated
by Col Washington in cotton & corn and
I assisted aplan in working the same
as before stated & understood from Col
Washington he was occupying this land
during this time for Judge Charles Taylor
To 5th Dr

During the time mentioned Col
Washington cultivated the land in corn
& cotton. & I know this fact because I
assisted in working the same from
year to year. there was no other possession
in this Martins League except that of
Col Washington as stated
To the 6th Interrogatory

I worked upon this land from 1844
when I was a child until some time
during the civil war the same being
cultivated by Col Washington every year
during that time I was there as a
Slave of Col Washington

To the Cross Interrogatory is the Nature Answered
To the 1st Dr

I can read & write I am a Negro &
a ex slave
To the 2nd Dr

No one has talked to me about this
matter until today when I discussed the
matter inquired about ^{with} Mr & W Blount

in the presence of Mr Ellis the Notary
 taking these depositions
 To the 2nd & 3rd Int

I always understood from him that he
 was claiming the land as Agent of Judge
 Charles Taylor. I understood Judge Charles
 Taylor was owning the land & was claim-
 ing the whole Martiney Survey No 4

The only boundaries I can give is that the
 League was bounded on the East by the Trinity
 River & on the north by the Logan League
 To the 3rd & 4th Int

My understanding as to the claim of
 this land is from what I have heard

Col Washington say in his life time
 my understanding is they claimed the whole
 of the Martiney League - & not merely the
 land enclosed in the Davis field
 No one has ever discussed the Martiney lands
 with me until today I do not claim
 any of the Martiney land

Stephen Yob

~~Notary~~ The above written answers
 to the attached interrogatories and cross
 interrogatories read to the witness
 Stephen Yob and by him signed and
 duly sworn to before me on this day
 in testimony of which witness my
 hand and official seal This Sept 16th
 1904

B. F. Ellis Notary Public
 Sayacum Co Tex

1 State of Texas }
2 County of San Jacinto } 3

3 In compliance with the
4 commission to take the deposition of Frederick
5 Randolph of San Jacinto County, Texas, a
6 witness in the case of B. P. Lewis et. al. vs
7 J. P. Tucker et. al. in the District Court of San
8 Jacinto County, I caused the witness Frederick
9 Randolph to appear before me in the town of
10 Shepherd in said County and having read said
11 interrogatories to him and caused him to
12 answer same and reduced his said answers to
13 writing and caused him to sign same and
14 sworn to the truth of same

15 B. F. Ellis Notary Public
16 San Jacinto Co Tex

17
18
19 To the 1st Interrogatory he answered

20 my age is 77 years old and in 1840
21 I lived in Clark Co. Miss & came to Texas
22 in 1842 from to about 1840 to 1865 I
23 belonged to Col. H. Washington of San Jacinto
24 Co Tex

25 To the 2nd Interrogatory

26 During the time inquired about I
27 was a slave & belonged to Col Washington
28 & from 1842 until his death about 1868
29 I lived with him on his plantation
30 on the Trinity River in what is now San Jacinto
31 Co Tex & dont know what service of
32

land Col Washington plantation. 1000 ac
but that is where I lived during all that
time.

To 3rd Dist

I knew Col Washington well. I lived
with him from 1840 until his death. he was
my master & I was his servant.

To 3rd Dist

I knew Judge Charles Taylor who lived
in Nacogdoches. I knew him by having
frequently seen him at Col Washington's home
where I became acquainted with him.

To the 4th Dist

I know nothing of the surveys & League
lines but I know that Col Washington
occupied and cultivated his plantation on
Trinity River from 1842 until his death
& I further know that Col Washington occu-
pied and cultivated continuously from
about 1840 until some time during the
war. another field or farm near his
home place & south of same, but I
cannot say on what surveys these places
were. & I can't say whether Col Washington
was claiming this land for himself or
for some one else. The south field was
commonly known as the Davis place
having been occupied by Gen Jas Davis
about two or three years about 1843 & 1844

To the 5th Dist

I know nothing of this land as League No 4
but if the land which I knew as the Davis place

is on League No 4 Then I know that Col
Washington occupied & cultivated this field
every year from about 1843 or 1844
until some time during the Civil War
I know this because I assisted in working
the land every year in corn & cotton
during the time mentioned. If there was
any other possessor than this I know nothing
of it I know nothing as to whether Col Washington
held this land for himself or for some one
else.

To the 6th Int -

I know nothing as to League No 4 but if the
place south of Col Washington's home place
was on League No 4 then as before stated
I assisted every year in working the same
in cotton & corn from about 1844 until
some time during the ^{civil} war. I was there
as a slave of Col Washington.

To the Cross Interrogatories he answers as follows

To the X Int -

It is a fact that I cannot read & write
& am an ex slave

To the X Int -

No one has ever talked to me about
the matters here inquired about until
this morning when I talked to Mr J W
Blount in the presence of Mr Ellis the
Notary taking these depositions

To the X Int -

If the land which I have described as the

17
1 Davis place is on League No 4 then I
2 do not know whether Col Washington
3 claimed to own the same or not
4 I know nothing as to who was claiming to
5 own the land mentioned

6 To 3rd Cross Int

7 as stated I know nothing as to who
8 claimed the land or any portion of it
9 I know nothing of the extent of the land if
10 any claimed by Washington & Taylor &
11 only know as I have before stated how
12 Col Washington occupied & used the land
13 and how long he so occupied it.
14 Col Washington & Taylor never described to
15 to me the land claimed by either of them
16 I was summoned as a witness in a suit
17 in the Federal Court at Houston Tex concerning
18 my some Martins land & testified
19 as a witness in that suit and talked to
20 some lawyers in the case but dont
21 know who they were. I bought 25 acres of
22 land from Mr E B Smith of the herd Tex
23 & now live on it & understand it is
24 a part of one of the Martins surveys
25 I think on League No 3 I have lived
26 on the land about 12 years

27 ^{Frederick & Randolph}
The above answers of the witness ^{mark} Frederick K
28 Randolph reduced by me to writing and read to
29 him and by him signed and sworn to ^{before me} as correct
30 and true answers to the attached direct and cross
31 interrogatories - In testimony of which witness my
32 hand and official seal this 16th day 1904 -

33 B. H. Allen Notary Public
34 Sayre Texas

THE STATE OF TEXAS:

To the Sheriff or any Constable of San Jacinto County - GERRITZ:

YOU are hereby commanded to summon Matthew Mackery

it to be found in your county to be and appear before the District Court, to be holden within and for the County of San Jacinto; at the Court House thereof; in the Town of Cold Springs, on the Fourth Monday of

February

A. D. 1872

then and there to answer the complaint of Milam Taylor, Charles J. Taylor, A. Taylor & Eugene Taylor

filed in said Court, against the said Matthew Mackery

of which petition you, will serve the said Mr. Mackery with the accompanying certified copy.

Herein fail not, but do return make of this writ, at or before the Fourth Monday in March

A. D. 1872, showing how you have executed the same.

Witness H. Johnson Clerk District Court, San Jacinto, Texas.

Given under my hand and Seal of said Court, at Office, in the town of Cold Springs, this

the 15th day of February A. D. 1872.

H. Johnson

Clerk D. C., S. C. Texas,

Union Republican Print.

Spud
Feb 15th A.D. 1872

H. Johnson
W.D.C. 70

counter 35753

2

No 52

Milam Taylor
Et als

vs

Mathew Vickery

Original

Came to hand same
day issued and
executed February
22nd 1872 by deliv-
ering to the within
named defendant
M. Vickery in
person and in
San Jacinto
County a true
copy of this writ
and a certified
copy of Plaintiffs
petition.

Jas Hoque
shd r/s

By J. J. Liles
deputy

Filed Aug 24th 1872
H. Johnson
Clerk

THE STATE OF TEXAS,

To the Sheriff or any Constable of San Jacinto County, GREETING:

YOU ARE HEREBY COMMANDED THAT YOU SUMMON

John W. Strader and J. G. Pleding

to be and appear before the Honorable the District Court of San Jacinto County,
to be holden within and for said County, at the Court-House thereof, in the
Town of Cold Springs, on the first Monday after the fourth Monday in
February 1873, then and there to testify in behalf of the State *pendant*
in the case of *Melvin Saylor vs Matthew*
Vickery

now pending in said Court.

Herein fail not, but due return make of this Writ, showing how you have
executed the same.

Witness, **H. JOHNSON,** Clerk of District Court of San Jacinto County.

GIVEN UNDER MY HAND, this the *26* day
of *February* A. D. 1873

H. JOHNSON,
Clerk D. C. S. C.

No 52

William Taylor

vs

Matthew McKee

Subpoena

Comer to hand
same day
from deed

executed by
reading this
with to the
within court
critiques

James Hogan
Chff of

By J. J. Liles
Deputy

count 1856

William Taylor vs
Mathew Vickery
No 52

In Dist Court of
San Jacinto County
March Term 1872.

Now comes the defendant
in the above styled cause, by
his attorneys and moves the
court to grant a new trial in
this cause for the following
reasons, to wit:

1. The verdict of the jury is contrary to the law.
2. The verdict of the jury is contrary to the evidence.
3. The court erred in the charge to the jury.
4. The court erred in permitting Spanish Title, ^{to go} to the jury, as it did go.
5. The court erred in permitting the certified copy of the deed of Jose Dolores Martinez, from Polk Co - without a seal to go before the jury.

4' C. The court erred in admitting
counter 35757

4^v

in evidence the deed from Jose Dolores Martinez purporting to convey away an undivided half interest in said lands, because there was no notarial seal to the instrument, to which defendant objected.

7. The court erred in permitting to be used in evidence a copy of a copy of records in Nacogdoches County -

And for other reasons apparent

J. M. Cropon & W. B. Denson
attys for Defn

125
William Taylor

vs
Matthew Vickery

Motion for new
Trial

Filed March 6 1873

H Johnson
Clerk D.C. etc
for A. Hoelbling
Deputy

counter 35459

W. Taylor
vs

W. Beckery

deposition of
F. M. Benson

~~2909 20~~
L. J. Taylor

State of Texas
San Jacinto Co I received
the hands of J. F. Henry
Sirt Justice of Peace County
before whom the within dep-
ositions were taken and
that same have not
been changed since
they have been in my
hands -

Sworn to &
subscribed
before me this
11th Nov. 1872

L. J. Taylor

W. Salmon clerk, &c, &c

35710

Recd this Package from the
hands of - C. D. Taylor this November
6th A.D. 1872. H. Johnson

Clerk D. C. S. C.

The Clerk of the District Court
opened at the request of Plaintiff
Council Nov. 6th 1872 - H. Johnson
Cold Springs
Texas

counter 35761

The State of Texas
To the Clerk of the District
Court of Palk County - Greeting:
You are hereby authorized and
empowered, to cause, to come before
you A. M. Sansam, a resident of
your County, and his answers to
take to the accompanying
interrogatories, propounded to
A. M. Sansam in a certain
cause ~~now~~ pending in the
District Court of San Jacinto
County, wherein Wilam Daylor is
Plaintiff and Matthew Victory
is defendant, and having reduced
said answers to writing, you will
cause said witness to swear to and
subscribe them before you, to which
you will certify officially; after which
you will seal up said answers and
interrogatories, together with this
Commission, in a package directed
to the Clerk of the District Court
of San Jacinto County Cold Springs
Texas, conforming in all respects
to the requisition of the statute in
such cases made and provided.

Witness My Hand and Seal of the
5' District Court of San Jacinto

21
N
5

County and the seal of said Court
at office in the town of
Bald Springs this the 2nd
day of November 1872.
H Johnson
Clerk D. C. O. S.

No 5-2

H. Taylor

vs

W. Hickory

Commission

Spued @ 1872

H Johnson

Clerk D. C. O. S.

to
M. Daylor
vs
Matthew Vickery

Suit pending
in the Dist.
Court of San-
Jacinto Co. Texas

Sir. You will take notice
that five days after the service
hereof, I shall apply to the
Clerk of the District Court in and
for San. Jacinto County for a Commission
to take the depositions of Francis M.
Sanson, who resides in Polk County
Texas, in answer to the following
Interrogatories, to be read as
evidence in behalf of the
defendant on the trial of said
cause?

To
or, J. S. Clelland
his atty of Record.
Interrogatories to be propounded
to Francis M. Sanson a witness
for defendant:

Int. 1 Are you acquainted with the parties
to this Suit?

Int. 2nd Are you acquainted with the
tract of Land, in San Jacinto
County Texas, upon which the
defendant Matthew Vickery now lives?

3
3

8

54
Int. 3rd If in answer to last interrogatory you state that you know the said tract of land, then state how long you have known it, how long has the defendant resided upon it, who first settled it, or had it settled? and when it was so settled? who claimed it? occupied and used it in the year A.D. 1851 and consecutively down to the present time? State the kind of population during said time? State who used, cultivated, enjoyed and claimed the same during said time and whether as tenants or otherwise? and if as tenants for whom?

Int. 4th State all you may know that will be of benefit to the defendant in this suit?

J. M. Corson
Atty for Defy

I do hereby accept service of the above and foregoing interrogatories waiving time and notice - this June 24th 1892
John S. Cleveland
Atty for Plaintiff

Emp Interrogatories to be
propounded to Francis M. Sanson
a witness for the defendant.

x Int. 1

If in answer to the last question
asked in direct Interrogatory
No three you reply that the
said tenants held under
Col. Hamilton Washington
Please state whether or not
the said Washington let said
Lands as an attorney for
C. S. Taylor?

x Int. 2 If said Washington claimed
the said Land as his own
please state by what right
or title he did so?

x Int. 3 Please state the contract between
said Washington and said
Mathew Vickey, whereby Mathew
Vickey came in possession of
said Lands?

x Int. 4 Please state any thing you
may know in relation to said
transaction which may be
beneficial to plaintiffs in
this cause?

Cleveland & Lea
Attys for Defts -

5-6

84

State of Texas

San Jacinto County E. J. Hervey
certify that the above
and foregoing is a true
and correct copy of the
original direct and
copy in terrorem as
now appears of file in
my office.

Given under my
hand and seal this
the 2nd day of Nov-
1872. H. Johnson
Clerk D. C. S. J. C.

No 5-2
H. Taylor

as
H. Vickery
Copy of
Subscriptions

county 35767

M. Taylor et al }
vs }
Matthew Vickery }
Sut pending in the
District Court of
San Jacinto County

Sir you will take notice, that five
days after the service hereof, I shall
apply to the Clerk of the District Court
and for San Jacinto County, for a Com-
mission to take the depositions of
Francis M Sanson who resides
in Polk County Tex, in answer
to the following interrogatories, to be read
as evidence in behalf of the
defendant on the trial of said
Cause.

To
J. Cleveland
his atty of Record

Interrogatories to be propounded
to Francis M Sanson a witness
for defendant

Int 1. Are you acquainted with
the parties to this suit?

Int 2. Are you acquainted with
the tract of land in San Jacinto
County Tex, upon which the

85
defendant, Matthew Bickery⁹²
now lives?

Int 3. If in answer to last interrogatory
you state that you know the
said part of land, then state
how long you have known it,
How long has the defendant
resided upon it, who first
settled it, or had it settled, &
when it was so settled it?

Who claimed it, occupied and
used it in the year 1857, and
consequently down to the present
time? State the kind of occupa-
tion during said time? State
who used cultivated enjoyed
& claimed the same during said
time, whether as tenants or
otherwise, & if as tenants
for whom?

Int 4. State all you may know
that will be of benefit to the
defendant in this suit.

J. M. Crofton
Atty for Deft.

M. Taylor et al

I do hereby accept service of the above & foregoing Interrogatories having time and notice this June 24th 1872. John S. Cleveland

Attorney for Plaintiffs

No 52
M. Taylor et al

Cross interrogatories to be propounded to Francis M. Langdon a witness for the defendant

X Int 1

If in answer to the last ~~Interrogatory~~ propounded. Question asked in direct-interrogatory No three you reply that the said tenants held under Col. Hamilton Washington Please state whether or not the said Washington at said lands as an attorney for C & Taylor?

X Int no 2

If said Washington claimed the said land as his own please state by what right or title he did so?

X Int no 3

Please state the contract between said Washington and said Matthew Vickery whereby Matthew Vickery came in possession of said lands

X Int no 4

Please state any thing you counter 35770

may know
~~which~~ in regard to said
transaction which may be
beneficial to plaintiffs in
this cause?

Cleveland & Co
Attorneys for file

No 52

M Taylor

Et. als

vs

M. Vickers

Interrogatories

Filed June

24th 1872.

W Johnson

Clk. P. O. C.

C. S. J. Co.

M Taylor vs Mathew Bichery Joants Co. } said pending in the
District Court of San
Diego

Depositions of F M Sanson ^{citizen of Pueblo} in
answer to interrogatories propounded
to him in the above cause taken before
J Hemykleit of the District Court of Pueblo

To Int

1st He says - I know Mathew
Bichery -

Int 2nd He says - I have traveled
the road to Truckburg frequently
which runs by his house -

Int 3rd

He says - I think I first
saw it in 1853. I think the
Defendant went there soon
after the war - Col. Washington
first settled it - My recollection
is that he ^{held it} held it in possession
upto the outbreak of the war -
During the war several persons
resided on it but I do not
know in what relation. I
suppose as tenants of Col
Washington - From the time that

512
Matthew Bectery moved on it & I do
not know whether he ~~acted~~ held
as tenant or not.

X 1st

He says - My impression is that
he (Col. W-) thought the settlement
for some years was on his
land. Afterwards I heard him
say he knew it was not. I don't
know whether he con'td the land as an attorney
of Col Taylor or not.

X Int 2nd He says - I suppose
that he at first held it
thinking that it was on the
Tear of his League -

X Int 3rd He says - All I know is
that I heard both of the parties
say that a wagon passed as
the consideration for the
improvements on the place -
I don't know any thing
else - of benefit to either
party -

H. W. Sanson

State of Texas, I James F. Henry
County of Rock Clerk of the District
Court of Rock County, hereby certify
that the foregoing answers of
F. W. Sanson the witness before
named were made before an
and were sworn to and subscribed
before

Witness my hand and official
Seal this 5th day of
October

A 1872
James F. Henry
C. C. C.

5-2

M Gaylor

23

M Vickroy

counter 3545

5
14

11

Taylor et al } In District
 } Court, San Antonio
 } Texas,
 } March Term 1873
vs. }
Matthew Vickery }

And now come the plain-
tiffs, in the above cause,
by their attorneys, the leave
of the Court having been
first had and obtained,
and amended their original
petition as follows. They
avere, that James Davis was
the purchaser from Jose Do-
lores Martinis, of the other
half interest in ^{the} Clever
Seague Grant mentioned
in said petition, of which
the other half interest, was,
as is alleged in said peti-
tion, purchased by the said
Charles S. Taylor, all of which
is manifest from the cer-
tified copy of deed from
said Martinis to said
James Davis, herewith filed
and marked Exhibit 2, &
the defendant is hereby no-
tified that said copy will
be used as evidence on the
trial of this cause, the origi-
nal not having been found.
And amended their amended

6

petition in this. That the
deed from Jose Dolous Mar
tinez was recorded in the
County Clerk's Office in
the County of Liberty, Com.
Texas on to the 28th day of
November A. D. 1837. in Book
B. pages 9, 10 & 11.

Wherefore he prays as in original
petition.

Cleveland & Lea
Attys for pl'tff

No 82

William Taylor

v

Matthew Hickory

Filed March 3^o 1873

H Johnson
Clerk
for B. H. Stockton

Fulton Nov. 16.
1872 Kephart
C. K.
D. E.

Taylor }
vs }
Vickers }

And now comes the defendant leave of Court just had & amended his original answer.

And for further plea in this behalf the said defendant says that said plaintiff ought not to have & maintain his aforesaid action, because he says that he claiming to have good & perfect right & title thereto, has had & held by himself & those under whom he claims, peaceable, continuous & exclusive & adverse possession of the lands & tenements claimed in said plaintiff's petition, cultivating using & enjoying the same for a period of more than ten years next before the commencement of this suit & this he is ready to verify

And for further plea the said defendant says that said plaintiff ought not to maintain his said suit, because he says, that he claiming to be the true & lawful owner thereof has had ^{held} by himself & through those from whom he claims, peaceable, continuous & exclusive & adverse possession of the lands & tenements & premises claimed in said plaintiff's petition for more than ten years next before the commencement of this suit! and that the said plaintiff for said term of ten years hath not made entry thereon, Wherefore by reason of the premises, said

7 counter
35778

4
2
1
plaintiff's non entry on said land and
premises as aforesaid, he is forever barred of his
right of recovery against this defendant & that
he is ready to verify

And now comes defendant
suggests by his attorney to the court that
he & Harmon ^{his father deceased & others} Parkington dec'd, whose
estate he has in the aforesaid lands and
premises, have had adverse possession of
the same in good faith, for more than one
year next before the commencement of
this suit & that he & the said Parkington
have made permanent & valuable im-
provements, of the value of five thousand
dollars on the aforesaid land & premises
during the time he & the said Parkington,
have had such possession of the same
& that he is ready to verify & prove
wherefore he prays judgment for the
value of said improvements -

And further answering
defendant over, that he is an
innocent purchaser of two hundred
& twenty seven
acres of said land described as follows
now in County of San Jacinto, Beginning at a half buoy
on the west bank of of Mussel Shoal Creek on the line
of the Joe Dolores Machinery lease do four thence South 1050
or to an oak marked x thence East 4000 or to Mussel
shoal creek, thence N 1050 N, to stake, thence
~~West~~ to beginning

for a valuable consideration and without
notice of any outstanding title

That on to wit the 29th day of August 1870. he purchased
said last mentioned land & premises from one R
S. Seely, & paid to him said Seely the sum
of Two hundred Dollars & defendant has
ever since been in peaceful & quiet possession
of same using & cultivating same as his
own property.

And defendant further avers that
the said Two hundred twenty seven acres
above mentioned is not upon or a part of the
premises mentioned in plaintiffs petition.

G. W. Davis
Attorney
at large in said

74

Taylor

by

Victory

under arms

H. S. Clark

Harbory

Louisa Co

Y. S.

Taylor } Justices in
 M } Just Court San Francisco
 M Vetry } Court Nov Term 1872

And the said M Vetry by
 his attorneys comes & defends the
 full & complete & says he is not
 guilty of the supposed wrongs injuries
 & trespasses above laid to his charge
 way or either of them in manner
 & form as the said plaintiff hath
 thereof complained against him
 & of this puts himself upon
 the County.

~~Attest~~
 J. McArthur
 City Clerk

1872

Taylor

to
Wicks

Answer

Filed Nov.

11th 1872

H. Johnson
Clerk

county 35763

William Taylor } In Dist Court of San Jacinto
 } to County -
 } March Term 1873.
Mathew Vickery }

Now comes the Defendant Mathew
Vickery in the above styled cause
by his attorneys, leave of the Court
having been first obtained to amend,
and amends his original & amended
answer as follows to wit:

Defendant shows that he claims the
right ^{& title} to six hundred & forty acres of land,
including his improvements, upon the
land described in Plaintiffs petition
from and under Hamilton Washington
now deceased - that this defendant
purchased of the said Washington
all his right, title, interest & claim
in and to said land in the
month of the year A.D. 1865

for the consideration of one wagon
of the value of One Hundred & twenty
Dollars. That the said Washington
relinquished & released to this Defd
all his right, title & interest in &
to said land. that for more than
fifteen years prior to said transfer
of said rights the said Washington
had been in possession of said
land & premises. Defendant

3 am

No 52

William Taylor

vs

Mathew Vickery

Amicus Amicus

Filed
March 4th

1873

H Johnson

Attorney

Also herewith as part of this record
 the letter from Hamilton Mackin
 son of date July 9th 1868 showing
 that he had sold his right title
 and interest in and to said lands
 to Refundant, and another letter
 of January 11th 1869 showing the
 consideration of said lands
 therefore
 vs
 Attorney
 Refundant
 H Johnson
 Attorney
 Refundant

ms. A. 9. 35785

July 9th 1868

Matthew Vickery Esq

Dear Sir

I am ready at any time to convey to you the improvement, according to agreement, with all the rights it carries with it. I only ask of you to have the survey and the necessary papers written

Very truly yours

H Washington

Exhibit "A"

Matthew Vickery Esq
At Home

2

6

Coastal Village

Jan'y 11th 1867

Matthew Vickary Esq

Dear Sir

Please send

by express the wagon & gears

and oblige Yours Truly

H. Washington

192

ms. A. 1. 1. 1

Exhibit "L" 18

Matthew Brekany &
St. Louis

counter
35789

Melam Taylor et al,

No. 52.

vs.

Charge of Court.

Matthew Vickery.

If the jury are satisfied from the evidence that the land set out in plaintiffs' petition is in the possession of the defendant, and that the land is included in the lease granted by the Government of Columbia and Texas to Martinez, and that plaintiffs have shown title to the land, ^{in controversy} by the deeds or instruments of writing read in evidence, then you will find for plaintiffs -

If you find for plaintiffs under the foregoing instruction, then you will also find for them the reasonable value of the use and occupation of the land in controversy for the time the defendant is shown by the evidence to have been in possession, ^{but} not to exceed the time claimed in plaintiffs' petition.

If the evidence does not show that plaintiffs are entitled to recover under the above instructions, then find for the defendant.

If you find the land to be plaintiffs, there is no evidence that defendant is a possessor in good faith and he is not entitled ^{under the law} to any pay for improvements.

J. R. Burnett,

counter 35790 • Presiding Judge.

No. 52.

Milam Taylor
Lottens

No. 1 Change.

Matthew Vickery

counter 35791

10

13

Special charge asked by
Defendant.

Defendant asks the court to
charge the jury that if the jury
does not find that the Defen-
dant from the evidence that Matthew
Vickery is living upon Plaintiff's
land - or if ~~they~~ he has
not admitted that he is living
upon the land of Plaintiff
then they shall for Diph

Given

J. R. Bennett,
Judge, &c.

We the jury do
 find in favor
 of the Plaintiff
 and award to same
 the sum of ~~\$350~~^{\$276.00}
~~per acre for~~
~~2 years occupation~~
 J. J. Patrick
 Foreman

In case of ~~land~~ ~~new~~

Reverend Cold Springs
Nov 5th A.D. 1874 of
y B. Ryan clerk of the Dist
court of San Jacinto County
the following original papers
in case No 52 of Taylor Et Al
vs Vickery - withdrawn by your
order of the court -

- # 1 Deed from Martin & Taylor
- # 2 Land office copy of do.
- # 3 M.D. to C. Taylor
- # 4 M.D. Taylor to Julia Carl.

Chas. J. Taylor

Citizens Savings Oct 29. 1874
received of L. S. Jackson the
following papers Inquire par-
ticulars and from Davis to Taylor
Land Office Copy of letter
Chickland & Lee

attys for Taylor
P.S. It seems I have all the
papers excepting Nos 5 & 6. noted in
the attys receipt.

L. S. Jackson

counter 35795

William Taylor
to the
3 letters title &
Master Vickery

Receipt for both
papers filed in this
Cabinet by self

Number 30 1888

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Presented to Springs December 22 1871 from
Mr Charles S. Taylor the following listed
papers for the purpose of bringing suit
thereon by -

1st Copy of a deed from Don Pedro's Marquis
to Charles S. Taylor for a half interest in the
above leagues of grant?

2nd A duplicate original deed to
same

3rd Deed from Charles S. Taylor husband
to the present heirs of the portion of the real estate

4 Contract between H. Washington & Charles S.
Taylor to mutually convey 100 acres of land
5 & 6 The original contract between said
Washington & Taylor for the sale of land
and said Marquis Bond for title both
in Spanish

7th plan map & plot of leagues 204 of the
Marquis El Leon leagues grant

John G. Chestnut
attorney at Law City
Springs San Jacinto Co

LEXIS -

13'

Taylor

Received from the clerk of the
District Court of Sanyassee
County, the following with papers
filed by the plaintiffs in the suit with

" Exhibit

1st Land office copy of Grant

A. 2 Duplicate original deed from James Davis
to Charles S. Taylor for 1/2 his 11 League

B 3 Same copy from DeKalb County records
& recorded in Sanyassee Co. deeds.

C Same copy from Liberty County record
of deeds.

D Deed of partition from James Davis
to Charles S. Taylor for his 1/2 in
League 4 & 10 tracts grant.

E deed from H. Washington to Charles
S. Taylor for his 1/2 in League of

2 Iron & tractors to James Davis
Copy of deed from records Polk Co

Original deed of partition to the
plaintiffs for League 4. by the
heir of Charles S. Taylor

This July 19, 1915

L. S. Taylor

for him self & et al

counter 35796

Taylor et al, } Just Dic-
us } ticut Court
Matthew Bishop } March Term 1873
And now comes John
S. Cleveland one of the At-
torneys for plaintiffs in
the above entitled cause,
and being by me duly
sworn deposes and says,
that he, as attorney as afo-
said, has made diligent
search for the deed of con-
veyance from ^{John} Dolores Martiney
to James Davis for one half
interest in the Clever Leaga
Grant to the said Martiney
from the Government as men-
tioned in plaintiffs petition,
said search, as is manifest
from the certain letter
of Dr. G. M. McCord filed
with this affidavit, being
made of & to the effect that
Dr. G. M. McCord, of the Estate of James Davis
decd. who says that he has not the
original deed nor does he know
where it is.

John S. Cleveland

Sworn to and
subscribed before me

14 March 4th 1873. *John S. Cleveland* county 35799

No 52

H Taylor

vs

H Ticker

Affidavit

Filed March

4th 1873.

H Johnson
Clerk C. C.

44

enter 5000

SF 13387

SAN JACINTO COUNTY ROLLED SKETCH "X"
Copies of court papers sent by Shell Petroleum
Corp. — DISTRICT COURT

William Taylor vs Mathew Vickery
B. F. Lewis et al vs J. R. Rucker et al

SF 13387 J. R. Chapman

1935

*San Jacinto Co. Std. File 22
Transferred 12-31-1950-d*

counter 35801