

Samuel J. Wright et.  
als p[er]p.

Henry A. Gist de[sc]t.

Answer of Camilla  
H. D. Rodman

Answer of W. B. Rodman

To motion to compel  
pay<sup>t</sup>.

✓

Samuel J. Wright et als plp. } In the Cloths Office  
v } of the Superior Court  
Henry A. Gist Deft } for Beaufort County

William B. Rodman, makes himself a party to the  
proceeding against "Camilla his wife by notice of  
his right or estate as tenant by the courtesy and  
adopts her answer herewith filed in all respects  
Wm. B. Rodman.

1. 41  
Samuel T. Wright et als. plaintiffs

v  
Henry A. Gust ————— defendant

In Clerk's office of Superior Court

Beaufort County

They answer of Camilla H. D. Rodman wife of  
William B. Rodman to the motion of J. E.  
Shepherd Commissioner and to the petition of  
said plaintiffs.

1. The said Camilla admits that she bid off the  
land described in the pleadings in this case on  
the terms set forth in the report of said  
Commissioner, and referred to in said petition, and  
that she is in possession of the same.
2. That she has paid of the price of said land  
except one thousand dollars which was due on  
1 January 1877. - In making payment of the  
instalment due 1 January 1876. - she overpaid the  
sum then due by about three dollars, which it  
was understood should be credited on the final  
instalment which fell due as aforesaid on 1  
January 1877. With that exception said final  
instalment is unpaid.
3. She is ready and willing to pay said final

instalment) <sup>with interest thereon,</sup> (less the small deduction aforesaid) whenever a good title <sup>in fee</sup> to the land can be made to her by the authority of this Court,

4. She is advised that she cannot at present safely make such payment for that;
5. After the 1 day of January 1876. (at or about which time she made the payment then due,) she received information <sup>which she believes to be true,</sup> that certain persons, to wit:

William Hill Anderson,

Martha Ann Hull Anderson,

Amos Anderson,

Cherry Anderson,

Martha Hull Anderson,

William H. Freeman, and

Elizabeth Freeman,

all of whom she is informed and believes reside in, and are citizens of Monrovia in the Republic of Liberia, on the West Coast of Africa, claim title in fee to said land, as the heirs or devisees



of one Hull Anderson now deceased, or otherwise,  
and they have threatened to sue her for the  
recovery of said land. She is informed that  
some of said claimants are infants. She has  
made diligent inquiry and such persons can not be found in  
this State. She is advised and believes that said claimants  
have no valid or legal title to said lands. But  
she submits, that inasmuch, as she bargained for,  
and was induced to believe, that she was buying, a  
good title <sup>in fee,</sup> she ought not to be subjected to the  
expense and trouble of depending or establishing it,  
or compelled to pay the price, until it shall be  
adjudicated that the Commissioner acting under the  
authority of this Court can make her a good title  
in fee, by some judgment binding upon the  
said claimants, and on all persons claiming under them.

6. To that end, she demands that <sup>the</sup> proceedings against  
her to compel payment of the unpaid residue of  
the price, may be stayed until <sup>each</sup> judgment shall  
be had, and that in the meanwhile, the said  
claimants may be required to intervene, and may  
be made parties according to the practice of the  
Court, in order that they may ~~prove their title~~.

establish their title, or be bound by the  
judgment of the Court, if adverse to ~~it~~ them,

Camilla H. D. Rudman

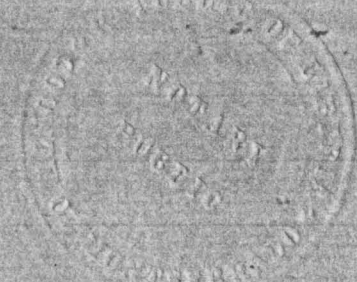
Sworn to by said Camilla H. D. Rudman before me on  
this 8<sup>th</sup> day of March 1877.

Judge Blount

Sub. Sup. Court

Montenado County  
Republic of Liberia

5



I, David M. Payne, Notary Public, for  
the County of Montenado, Republic of Liberia  
duly appointed, do certify that the whole of  
the foregoing depositions of Martha Ann Stull  
Anderson, Amos Anderson, George St. Rupert  
& Ferdinand C. Stroman, to be true and  
that the said depositions were publicly taken  
in my office in the City of Monrovia, County  
of Montenado, Republic of Liberia, beginning  
on the 11<sup>th</sup> day of November A.D. 1878.  
In witness whereof I have hereunto set my  
hand and notarial seal this 20<sup>th</sup> day  
of November A.D. 1878.

David M. Payne  
Notary Public  
Montenado County  
Republic of Liberia





Jamuel J. Wright + others	}	North Carolina
vs		Beaufort County
Henry A. Grist + others	}	Superior Court

In pursuance of the Commission issued from the Superior Court of Beaufort County, signed by John G. Blount, Clerk thereof and witnessed by J. D. McPayne, Notary Public on this 11th day of November A. D. 1878 at Monrovia, in the County of Montezuma, Republic of Liberia & at my office did come the following persons to appear before me to wit: Martha Ann Hull Anderson, Amos Anderson, Wm. H. Freeman & Ferdinand C. Freeman who each being duly sworn upon the Holy Evangelist of Almighty God did depose & say each for himself & herself

Martha Ann Hull Anderson deposes as follows.

- 1<sup>st</sup> State your age, occupation & place of residence  
I am thirty one years old, Milliner's occupation, and reside in Monrovia.
- 2 What were your parents named? & are they now dead?  
William Henry Anderson & Mary Jane Anderson. My father is dead, my mother is still alive.
- 3 When did your father die?  
In Monrovia, Montezuma County.
- 4 Whom did Hull Anderson marry? & when did he & his wife live at date of his death?  
I do not know.



Hull married Cherry Grimes, and they lived in Monrovia at the date of his death.

5 Did Hull Anderson at any time reside in North Carolina & if so when at, and when did he leave North Carolina & when did he go to? when when did Hull Anderson & Cherry die? Yes, he resided in North Carolina, in Washington N.C., he left North Carolina in A.D. 1841, he went to Baltimore and immigrated to Liberia, Hull Anderson died 19th July A.D. 1852, & Cherry died 14th July 1862, both died in Monrovia

6 When did he arrive in Liberia & has he resided in Liberia continuously up to his death?

He arrived in Liberia A.D. 1841, and resided continuously in Monrovia, Montserrat County, Republic of Liberia.

7 What was Hull Anderson's age when he died? He was 68 years old.

8 How many times was Hull Anderson married? He was married once.

9 When did he marry Cherry Anderson at? He married her in Washington, North Carolina.

10 How long did Hull & Cherry Anderson live together as man & wife to your own knowledge? I can only remember them living together as man & wife about 3 years - this is to my own knowledge.

11 How many children, legitimate children did Hull Anderson have & who was the mother? He had one to my knowledge & Cherry was the mother.

12 What child or children did Hull have at his death?

He left one son, William Amey Anderson



Was William Henry Anderson the only child of Hull Anderson?

To my knowledge, he was.

14 Did Hull Anderson leave any grand children except the children of William Henry Anderson?

He did not.

15 State who were the sole heirs at law of Hull Anderson at his death.

William Henry Anderson was sole heir

16 Did Chury Anderson, the wife of said Hull Anderson's death except Henry Anderson?

She did not.

17 Is William Henry Anderson living or dead at this time?

He is dead.

18 When & where did he die?

He died July 29<sup>th</sup> A.D. 1877 in the city of Monrovia.

19 Did William Henry Anderson leave any last will & testament?

He did not.

20 Who are the children of William Henry Anderson & who are his heirs at law?

I - Martha Ann Hull Anderson, Elizabeth C. Anderson & Amos Anderson. His heirs at law are any of Amos Anderson and Elizabeth C. Anderson.

21 Did you state that the children heirs at law of William Henry Anderson as well as heirs at law of Hull Anderson were - Martha Ann Hull Anderson, Elizabeth C. Anderson, & Amos Anderson?

I did.



- 22 Is Amos Anderson living? & when can he be reached?  
He is still living & resides in the City of Monrovia,  
County of Montserrado, Republic of Liberia
- 23 Is Elizabeth Anderson dead & when & where did  
she die  
She is dead. She died in the City of Monrovia, 30<sup>th</sup>  
May A.D. 1873.
- 24 Whom did she marry if any one & when and  
where  
She married Ferdinand C. Freeman April  
3<sup>rd</sup> 1871, in the City of Monrovia.
- 25 Is Wm. H. Freeman the only heir at law &  
child of Elizabeth Freeman formerly Elize-  
beth Anderson?  
He is
- 26 What was his father's name?  
Ferdinand C. Freeman
- 27 Did Hull Anderson leave any last will  
& testament?  
He did. Herewith find copy of said  
will -
- 28 Have you ever given any one a copy of  
the will?  
I have, to my lawyers in New York Saily  
& Perry 34 Park Row, New York.
- 29 Did Henry Anderson leave any last will &  
testament?  
He did not
- 30 Did Elizabeth Freeman formerly Elizabeth  
Anderson leave any last will & testament?  
She did not
- 31 How long have you been absent & a non resi-  
dient



resident of North Carolina

I have never resided there.

32

How long has Amos Anderson been a non resident of North Carolina?

He has never resided there.

33

How old is Amos Anderson? & when & where was he born

He is 26 years old. Born December 28<sup>th</sup> 1850 in the City of Mouronia.

How old is W. H. Freeman & when & where was he born?

He is 6 years of age. Born 23<sup>rd</sup> March A. D. 1872 in the City of Mouronia.

Has he ever been a resident of the United States?

He has not.

36

Have you in your possession a deed from Bryan Grimes of Pitt County North Carolina to Hull Anderson conveying to said Anderson lot number 36 Van Norden town Washington North Carolina with water front? If you have such a deed please attach the original of it to your deposition. If you have it not tell what has become of it.

I have not that deed in my possession, but it is in the possession of Dailley Perry our lawyer. <sup>34 Park Row N.Y.</sup> also deed number 37 Van Norden town Washington North Carolina when was Hull Anderson, if ever, in possession of the above named lots 36 & 37 & how long after he purchased it was he in possession of it?

37

He was in possession of lot number 36 in & since March 7<sup>th</sup> 1832 & number 37, 1833 23<sup>rd</sup> of October. He possessed them until he died.



38. When was Hull & Cherry Anderson married at?  
In Washington, Beaufort County NC
39. Have you any memorandum or Bible en-  
try or any written evidence of the time &  
place of their marriage? If so attach the  
leaf or memorandum or written evidence to your  
deposition

"Copy from Family Register"  
"Hull Anderson was married to Chease-  
lynn in 1827 in Washington, North  
Carolina"

I do hereby certify that the above copy  
is a true copy from the original in the Bible  
of Hull Anderson, in that part of the Bible  
appropriated to Family Register.

David M. Payne  
Notary Public  
Montevado County  
Republic of Liberia

Martha Ann Hull Anderson

I hereby certify that the above is a true  
copy of the deposition of Martha Ann Hull  
Anderson as taken by me, and that the  
signature of the said Martha Ann Hull  
Anderson is her true signature and was  
done in my presence

David M. Payne  
Notary Public  
Montevado County  
Republic of Liberia



Ferdinand C. Freeman having been sworn deposed as follows.

1 Are you the guardian of Wm H Freeman when & when & by what authority were you appointed?

I am the Father of Wm H. Freeman  
2 How old is Wm H. Freeman & when & where was he born: who were his parents & what relation is he to Hull Anderson  
He is six years old, born in the City of Monrovia on the 23<sup>rd</sup> March 1872: and is great grand Son of Hull Anderson: his parents were myself and Elize both Freeman formerly Elize both Anderson.

3 How old are you & when & where were you born & when did you go to Liberia  
I am 36 years old. Born in Louisville, Kentucky U.S & immigrated to Liberia in 1849

4 Did you know Hull Anderson?  
I did not know him

5 When were you and Elize both Freeman formerly Elize both Anderson married & where at?

We were married on the 3<sup>rd</sup> day of April A.D. 1871 in the city of Monrovia, Montserrado County, Republic of Liberia.

Ferdinand C. Freeman

I do hereby certify that the above is a true copy of the deposition of Ferdinand C. Freeman as taken by ~~me~~ and that the signature of said Ferdinand C. Freeman is his true lawful signature sworn for in my presence.

David M. Payne

Notary Public

Wm



George St. Keyser being sworn, deposed as follows:

1. When were you born, your present place of residence & how long you have lived there?

I was born in Portsmouth, Virginia. U.S. I reside in the City of Monrovia & have lived here 28 years.

2. Do you know Martha Ann Hull Anderson, Amos Anderson & W. H. Freeman & how long have you known them?

I know them & have known them at least 20 years - that is the two former, the latter from his birth.

3. Who were their parents & the Parents of each & what relation is each to Hull Anderson.

William Henry Anderson & Mary Jane Anderson were the Parents of Martha Ann Hull Anderson & Amos Anderson; Ferdinand C. Freeman & Elizabeth Freeman formerly Anderson were the parents of the latter - W. H. Freeman. The former - Martha Ann Hull Anderson & Amos Anderson - were the Grand Children of Hull Anderson & W. H. Freeman the great Grand Child of Hull Anderson.

George St. Keyser

I do hereby certify that the above is a true copy of the depositions of George St. Keyser as taken by me and that the signature of the said George St. Keyser is his true signature and was done in my presence.

David M. Payne, Notary Public  
Montserrado County  
Republic of Liberia



Amos Anderson being sworn deposed as follows;

1<sup>st</sup> State your age, occupation & place of residence.

I am 28 years old; occupation, farmer; place of residence, Monrovia

2<sup>nd</sup> What were your parents named? and are they now dead?

William Henry Anderson & Mary Jane Anderson. My father is dead; my mother is alive.

3<sup>rd</sup> When did your father die, & in the City of Monrovia.

4<sup>th</sup> Whom did Hull Anderson marry? & when did he and his wife live at date of his death

He married Cherry Grimes & at the time of his death, resided in the City of Monrovia

5<sup>th</sup> Did Hull Anderson at any time reside in North Carolina? & if so when at & when did he leave North Carolina & where did he go to? & when & when did Hull Anderson & Cherry die?

He resided in Washington, Beaufort County, North Carolina; he left North Carolina in A.D. 1841 for Liberia; they both died in the City of Monrovia - Hull Anderson died on the 19<sup>th</sup> July 1852 & Cherry died 14<sup>th</sup> July 1862.

6<sup>th</sup> When did he arrive in Liberia & has he resided continuously in Liberia up to his death?

He arrived in Liberia in 1841 and resided there continuously to his death.



7 What was Hull Anderson's age when he died?  
He was 68 years old

8 How many times was Hull Anderson married?

He was married once to my knowledge

9 When did he marry Cherry Anderson at?  
In Washington, ~~the District of Columbia~~, N.C.

10 How long did Hull & Cherry Anderson live together as man & wife to your own knowledge

I was first born <sup>you may say</sup> at Hull Anderson's death

11 How many children ~~did~~, legitimate, children did Hull Anderson have & who was the mother

He had one child & Cherry Anderson was the mother

12 What child or children did Hull leave at his death?

He left William Henry Anderson only.

13 Was William Henry Anderson the only child of Hull Anderson?

He was to my knowledge

14 Did Hull Anderson leave any grand children except the children of William Henry Anderson?

He did not.

15 State who were the sole heirs at law of Hull Anderson at his death?

William Henry Anderson

16 Did Cherry Anderson, the wife of the son Hull have any other children at Hull Anderson's death except William Henry Anderson?

She did not.



- 17 Is William Henry Anderson living or dead at this time?  
He is dead
- 18 When & where did he die?  
He died 29<sup>th</sup> July 1877, in the City of Monrovia, County of Montserrat, Republic of Liberia
- 19 Did William Henry Anderson leave any last will & testament?  
He did not.
- 20 Who are the children of William Henry Anderson & who are his heirs at law?  
Martha Ann Hull Anderson, Elizebeth Anderson & myself.
- 21 Did you state that the children & heirs at law of Henry Anderson, as well as, heirs at law of Hull Anderson, were Martha Ann Hull Anderson, Elizebeth Anderson & yourself.  
I did
- 22 Is Elizebeth Anderson dead & when & where did she die?  
She is dead. She died in the City of Monrovia 30<sup>th</sup> May 1873
- 23 Whom did she marry, if any one, & when & where  
She married Ferdinand C. Freeman April 3<sup>rd</sup> 1871 in the City of Monrovia
- 24 Is W<sup>m</sup> H. Freeman the only heir at law & child of Elizebeth Freeman formerly Elizebeth Anderson?  
He is.
- 25 What was his father's name  
Ferdinand C. Freeman



10  
26 Did Elize both Freeman formerly Elize but  
Anderson learn any last will and testament.  
She did not.

27 How old are you & when & where were you  
born?

I am 28 years old, Born in the City of  
Monrovia, County of Montserrat, Repub-  
lic of Liberia, on December 28<sup>th</sup> 1850

28 How old is Wm H. Freeman & when & where  
was he born

He is 6 years old, born March 23<sup>rd</sup> 1872,  
in the City of Monrovia.

29 Have you ever been a resident in  
North Carolina?

I have never been

30 Have you ever been a resident of the  
United States.

I have never been a resident of the United  
States

Amos Anderson

I do hereby certify that the above is a  
true copy of the depositions of Amos An-  
derson as taken by me, and that the  
signature of the said Amos Anderson  
is his true and lawful signature and was  
done in my presence.

David M Payne

Notary Public

Montserrat County

Republic of Liberia

Copy of Assignment  
of S. J. & Sidney E. Wright  
To  
Nathaniel S. Fulford.

I will not accept  
for \$200- but I do  
accept for whatever  
sum may be due  
Messrs. Wright- after the  
whole matter is  
decided, deducting  
costs, fees & other  
expenses.

Jas. E. Shepherd,  
Counr.

Copy filed by  
Consent & to be  
read in  
presence by  
Consent

W. H. Smith



To Jas. E. Shepherd, Esq. Commissioner.  
For a valuable  
consideration we have assigned & conveyed  
to Nathaniel S. Fulford our right-title &  
interest to amount of \$200 - jointly or  
severally owned by us in the proceeds  
of sale of the house, and lot purchased  
by Camilla D. Rodman & sold by you  
as Commissioner. You will please pay  
said Fulford two hundred dollars out  
of the first funds received by you for  
us with interest at six per cent from  
this date on said two hundred dollars  
from March 16<sup>th</sup> 1877. This writing will  
be a discharge & release in full to you  
from all liability to that amount from  
us. Witness our hands & seals this  
March 16<sup>th</sup> 1877.

Witness

Sarah A. Rice,

Es. H. Brown for witness to

Sidney C. Wright - Seal

S. J. Wright - Seal

The foregoing is a copy - the original  
being in the hands of Nathl S. Fulford.  
May 12<sup>th</sup> 1882.

J. E. Buckman  
Clerk & Referee.