

Q. Or about manuscripts? A. What kind of manuscripts?

Q. Written in her handwriting. A. Referring to what?

Q. Referring to the matters which we are suing about in this litigation, namely, certain material written by her in her handwriting and written in the Russian language? A. Well, you are suing on diaries of Madame Roerich, will you kindly read to me what you are suing on?

Q. The complaint reads: "That the plaintiff was and still is the owner of manuscript diaries written in her handwriting contained in copy books beginning with the date of March 24th and continuing through to and including the date of February 3rd, 1935". Do you have any recollection of ~~manuscripts~~ ever seeing those writing? A. I have a recollection of seeing manuscripts in Madame Roerich's handwriting pertaining to spiritualistic seances; part of those manuscripts have been made public property in the Agni Yoga books and these were copies of Madame Roerich's copies which she has made from and during spiritualistic seances. I have never owned those books, but I have seen them --

MR. STERN: Just answer the question

Q. You were in the midst of saying something, you say you saw them in printed form too? A. Yes.

Q. In these Agni Yoga books? A. In the Agni Yoga Books.

Q. Did you ever see the originals in the manuscript form? A. I have seen them in typewriting which were sent to New York. I have translated some with Madame Roerich and they are public property. Some of those books were issued anonymous and the teaching came from a Mahatma of the East.

Q. You have seen the books, have you? A. Some of them.

Q. How many of them, would you say? A. A few; two or three, I haven't seen many.

Q. I am talking of the manuscript books, did you ever see any of those? A. Not all the diaries of Madame Roerich, those manuscripts of spiritualistic seances. I haven't seen any diaries of Madame Roerich. There doesn't exist such a thing of Madame Roerich.

Q. Did you see these manuscripts in black covers? A. Some.

Q. How many of those, would you say? A. I don't recall. Madame Roerich gave me, when I was in the East, a few books which state on it "copy", to bring as a gift to Mrs. Horch. That was when I was in the Himalayas, when I was living with Madame Roerich in the Himalayas, in Naggar, Kulu.

Q. What year? A. 1931.

Q. And you brought some of those books with you? A. Yes, a copy of Madame Roerich's copy which she has made specifically for Mrs. Horch as a gift.

Q. Were those copies which you brought with you in handwriting? A. In handwriting.

Q. Whose handwriting was it? A. Mrs. Roerich.

Q. Do they bear any date on the fly leaf, on the first page? A. I could not remember.

Q. Were all that you saw in black covers? A. The ones I saw had black covers.

Q. Did you see any one with the blue and gilt cover? A. I don't remember.

Q. And you brought some with you in 1931? A. Right, and I brought one or two in 1935, in March, when I returned the second time also for Mrs. Horch, a copy of a copy.

Q. Can you give me any idea of how many you brought with you in 1935? A. In 1935, it must have been; I don't remember exactly, perhaps two or three, not more. I don't recall exactly.

Q. And the other occasion was in 1931 that you brought the copies. A. 1931.

Q. How many of them did you bring with you then, have you any idea? A. No. I packed them together --

Q. ~~Was~~ It was more than one? A. Yes, it was more than one.

Q. Would you say it might be six? A. I don't remember, it was a few books.

Q. A few of them? A. Yes.

Q. Did you look at it that time to see whether they had any dates in the first part of the books? A. They might have had dates, and even the places where those spiritualistic seances have taken place.

Q. You mean, besides the dates they might have contained places, names/ of places, is that what you mean? A. Names of places.

Q. And just so that we can identify them a little more, do you recall any of those places? A. No. Well, perhaps if it is the books I brought down they must have been from spiritualistic seances which Professor and Madame Roerich had about that time.

Q. In 1931. A. Yes, they used to have seances and table tapping.

Q. In 1935 too? A. In 1935 too.

Q. Now, have you seen any of these books since your arrival in March, 1935? A. Yes, I have, in the Summer of 1935, some of those books in Moriah, Mrs. Horch's summer home.

Q. Moriah is somewhere in the Adirondacks, in New York State? A. In the Adirondacks.

Q. Did you see all that you brought with you in/ 1931 and 1935 at that place in Moriah, in 1935? A. I think Mrs. Horch has kept them there; I don't remember how many I saw, but I saw many of them.

Q. The ones you saw in Moriah in 1935, included those you brought in 1931 and 1935? A. I think so.

Q. Have you seen them since? A. No.

Q. You haven't got them? A. I never had them. After I brought them I gave them to Mrs. Horch and I never saw them and they never belonged to me.

Q. They were delivered by you personally to Mrs. Horch. A. Yes, they were delivered by me personally to Mrs. Horch.

Q. And as far as you know, they are not in your possession? A. No.

Q. As far as you know, the last time you saw them, they were in her possession? A. You remember when you sent up the sherriffs to my place?

Q. Yes. A. Yes, before they came up, whether you sent them up, there were two sheriffs and a lawyer, and they went through my closets, and they cautioned me then--they were annoying me plenty, and were ringing the bell for two hours and banging on the door, and they came into my apartment and asked for those books, and I said, I don't have them, and I didn't have them.

Q. The last time you saw any of those books was in the summer of 1935? A. A. The last time I saw them was in the summer of 1935, in Moriah, in the summertime.

Q. When you say "in Moriah" you mean in Mrs. Horch's summer resident? A. Mrs. Horch's summer residence.

Q. You mentioned before that some of them were put in printed form in the Agni Yoga books? A. I can mention the names, if you want it -- the books --

Q. I just want to know. A. -- (continuing excerpts in those books--

Q. Were those exerpts made after the summer of 1935, when you last saw them in Moriah? A. No, all those books were published before.

Q. The ~~manus~~ excerpts were printed previously to that time? A. They were printed previously to that time, unless I believe they are publishing now some new book by the name of OM or AUM; it is an Eastern word, and I think they are publishing a new book.

Q. Do you recall attending a meeting of the Roerich Museum in India on April 28th, 1931, at which were present Prof. Roerich, Dr. George de Roerich, Mr. V. Shibayeff and yourself? A. I don't remember, perhaps; I was present at some meetings, I don't remember the date.

Q. Well, I show you what purports to be a copy of Minutes of that meeting, does that refresh your recollection? (Handing witness paper). A. Yes, I signed it.

Q. And do you recall that this set of papers, consisting of six pages, does that seem to you to be the Minutes of the meeting held on April 28th, 1931, at which you were present? A. I didn't read the rest of the Minutes. I acknowledge Paragraph 8.

Q. And your signature appears in the last page? A. My signature appears in the last page.

MR. PLAUT: Would you mark it for identification, so we will know what we are talking about.

(The paper just above referred to was marked PLAINTIFF'S EXHIBIT 1 For Identification of this date.)

Q. Now, in Paragraph 8 of these Minutes which have been marked as Plaintiff's Exhibit 1 for Identification, there is this: "All manuscripts and letters of Professor and Madame de Roerich must be kept in a special vault, and the original manuscript of ALTAI HIMALAYA in Professor Roerich's own handwriting

should be kept in full order, likewise all manuscripts of all other articles by Professor de Roerich. Please inform us when this will have been completed". Now, having heard that read, can you state whether these books that you brought in 1931 and 1935 are the manuscripts of Madame de Roerich referred to in that paragraph? A. Not at all.

Q. They are different ones? A. Completely different ones, and they are manuscripts which we have referred to as having been published. They are also written in their own handwriting and they are published now, and Mr. Horch has bought a vault and they have put away there the ALTAI HIMALAYA, and they had some of those manuscripts written in Madame Roerich's handwriting; they have nothing to do with the books. That is again a copy of a copy, also in her handwriting.

MR. STERN: And has nothing to do with the books?

THE WITNESS: Has nothing to do with the books. These manuscripts are also written in Madame Roerich's handwriting.

Q. Which manuscripts are you talking about which were put in vaults?

A. The manuscripts which ere published by Agni Yoga and not only those, but Roerich has published a book called Commune in Russian, it is called OBSCHINA that Roerich published in Mongolia, and I don't know whether that manuscript was also there, but I think it was there, then there were other books, Leaves of Morya's Garden. I think there were took books, I could not specify exactly but some of those books written in Madame Roerich's handwriting were in Mr. Horch's vault which he has bought.

BY MR. STERN:

Q. None of those that you have been talking about now, did they have anything to do with these books that are in this suit? A. They have nothing to do with it. Those are different manuscripts. The manuscripts mentioned in Paragraph 8 just read by Mr. Plaut have nothing to do with the copies of copies of the spiritualistic seances given by Mrs. Roerich as a gift to Mrs. Horch.

BY MR. PLAUT:

Q. Those books and manuscripts that you have been just talking about and said were not the books and manuscripts referred to in the lawsuits, are they all in the vault? A. I don't know.

Q. I thought you said they were? A. They were at that time.

Q. In 1931? A. Yes, they must have been there. Whenever it was executed. I was in the Himalayas, I don't know when it was executed, but there was a vault bought by Mr. Horch and some of those loose-leaf manuscripts in Madame Roerich's handwriting were in that vault, but they have nothing to do with the books.

BY MR. STERN:

Q. What are those loose-leaf manuscripts? A. The loose-leaf manuscripts are excerpts of the same spiritualistic seances which have been published.

Q. Entitled Altai Himalaya? A. No.

Q. That is what the vault was for, for Altai Himalaya? A. No, not only for Altai Himalaya, but for those loose-leaf manuscripts of books which have been printed.

Q. In other words, everything that is in the vault has now been printed?
A. I believe so.

Q. And in the public domain? A. And in the public domain. I can enumerate the books, but I don't know whether they are all there; there were some type-written manuscripts; I believe so, I am not so sure.

BY MR. PLAUT:

Q. This stuff that was put in the vault, does that include the manuscripts of Madame Roerich that are referred to in Paragraph 8 of these Minutes, Plaintiff's Exhibit 1 for Identification? A. I don't know what was placed. I only saw those manuscripts when I was there. I understood that the reference of Madame Roerich referred to those loose-leaf manuscripts.

Q. What did you have in mind when you attended this meeting at which this was read, by "manuscripts"? A. I had the same thing in mind. I had in mind the manuscripts -- the loose-leaf manuscripts in Madame Roerich's handwriting of copies of spiritualistic seances which were supposed to come from an entity from the spirit world under the initials M.M. and which were published throughout these years.

Q. Those manuscripts referred to in Paragraph 8 had nothing to do with the manuscripts that were brought in 1931 and 1935 and gave to Mrs. Horch? A. No I didn't have those in Mind.

Q. Is that correct? A. That is correct.

Q. They are entirely separate from the books you brought with you 1931 and 1935? A. Yes.

Q. Something entirely different? A. Well, they had extracts of the same copies. Those were copies--

Q. Those books you brought with you in 1931 and 1935, so far as you know, were not placed in the vault? A. I don't know, I have given them to Mrs. Horch.

Q. That is the last place you say them? A. That is the last place I saw them.

Q. Do you claim that you own them? A. I never owned them.

Q. You don't claim that now? A. No.

Q. Did Madame Roerich ever ask you for the return of those things that you brought with you in 1931 and 1935? A. Not to me directly.

Q. Whom did she ask? A. When the sheriffs came, I believe you wrote a letter, if I am not mistaken--.

MR. STERN: Meaning, Plaut & Davis?

THE WITNESS: Yes.

Q. You said, not to you directly. A. She didn't ask me directly, I have received no letters from Madame Roerich to this effect.

Q. Then, what you had reference to when I asked you whether a demand had been made, was the letter from my firm. A. The letter from your firm.

Q. You haven't returned those manuscripts or attempted to return those manuscripts to Madame Roerich, either directly or to me? A. I didn't have any manuscripts to return.

Q. And the reason for that is, that you gave them to Mrs. Horch in 1931 and 1935? A. Those few that I had brought.

CROSS-EXAMINATION BY MR. STERN:

A. In 1931 and 1935 you received some manuscripts from Mrs. Roerich, is that right? A. I received copies of manuscripts of the Spiritualistic Seances from Mrs. Roerich, to be brought to Mrs. Horch as a gift, and I was the messenger.

Q. When you arrived in America, did you give them to Mrs. Horch? A. I gave them to Mrs. Horch, as per instructions.

Q. You said also that you saw them in Moriah? A. I saw them in Moriah in the summer of 1935.

Q. Were you in Moriah in 1935? A. Yes, sir.

Q. Have you ever seen them since? A. No.

Q. Have you ever seen them in New York? A. No, only in the summer of 1935 was the last time I saw them.

Q. Do you know whether they are still in Moriah? A. I could not tell you.

RE-DIRECT EXAMINATION BY MR. PLAUT:

Q. You don't know now where they are, do you? A. I don't know.

Q. In your talks with Mrs. Horch, the question of where they are hasn't come up? A. I didn't ask her.

Q. That isn't the question. I asked you, has the subject of where they are come up in the conversation between you and Mrs. Horch? A. It has not come up between us.

Q. You say you were the messenger to bring those manuscripts from Madame Roerich to Mrs. Horch? A. I was the messenger to bring those manuscripts from Madame Roerich to Mrs. Horch.

Q. What did Madame Roerich say to you? A. Madame Roerich told me that Mrs. Horch is supposed to be her heiress and I should take down to the United States these books for Mrs. Horch's children, for posterity as a gift from her.

RE-CROSS EXAMINATION BY MR. STERN:

Q. Did she tell you this or something similar to this on both occasions? In 1931 and in 1935? A. Yes, Mrs. Horch happened to be in India--Mrs. Horch I believe it was 1930, if I am not mistaken, was over in India and at that time Madame Roerich has given similar books, copies of the copies of the Spiritualistic Seances to Mrs. Horch as a gift, in my presence before she left.

BY MR. PLAUT :

Q. You were present at tha time? A. Yes I was present.

Q. Who else was present? A. Madame Roerich and Mrs. Horch.

Q. Nobody else? A. No.

Q. In 1931 and 1935, when you say you had these conversations with Madame Roerich as to what should be done with the books, where were those conversations? A. In Naggar Kulu.

Q. Who was present at those conversations? A. Nobody was present outside of Mrs. Roerich and Mrs. Horch.

Q. No, you misunderstand me--Mrs. Horch wasn't there in 1931 and 1935?

A. No, that pertained only to the books she has given personally to Mrs. Horch.

611 8
-2-
MR. STERN: He ~~mama~~ means, in the conversations Mrs. Roerich had with you in 1931 and 1935?

A. Nobody was present.

Q. Did you take any letter with you from Madame Roerich to Mrs. Horch concerning those books? A. I don't think so.

Q. On either one of those occasions? A. I don't think so.

Examination closed

Subscribed and sworn to
before me this day
of March, 1937.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
HELENA ROERICCH,
Plaintiff,

-against-

NETTIE S. HORCH and ESTHER J. LICHTMANN,
Defendants
-----X

S I R S :

PLEASE TAKE NOTICE that the enclosed are the interrogatories prepared on behalf of the plaintiff in pursuance of the order made and entered on September 3, 1937.

Dated, September 8, 1937.

Yours, etc.,
PLAUT & DAVIS
Attorneys for Plaintiff
76 Beaver Street
Borough of Manhattan
City of New York

To:
MESSRS. GREENBAUM, WOLFF & ERNST
Attorneys for Defendants
285 Madison Avenue,
Borough of Manhattan,
City of New York

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
HELENA ROERICCH,
Plaintiff,

-against-

NETTIE S. HORCH and ESTHER J. LICHTMANN
Defendants.
-----X

Interrogatories to be administered to HELENA ROERICCH, of Naggar, Kulu, Punjab, British India, plaintiff herein, a witness to be examined under the commission directed to be issued by order entered herein on the 3rd day of September, 1937, proposed on behalf of the plaintiff in the above entitled cause:

FIRST INTERROGATORY: What is your full name and your age?

SECOND INTERROGATORY: Where do you now reside and how long have you resided at that place?

THIRD INTERROGATORY: Are you married or single; if married, state the full name of your husband and where he resides.

FOURTH INTERROGATORY: What is the condition of your health?

FIFTH INTERROGATORY: Are you able to travel to New York?

SIXTH INTERROGATORY: Are you the owner of certain manuscript diaries written in your handwriting and contained in copybooks containing dates

beginning with March 24, 1920 and continuing through to and including February 3, 1935?

SEVENTH INTERROGATORY: If your answer to interrogatory numbered Sixth is in the affirmative, describe in detail the appearance of said copybooks.

EIGHTH INTERROGATORY: If your answer to interrogatory numbered Sixth is in the affirmative, are the said manuscripts, contained in said copybooks, in your own handwriting?

NINTH INTERROGATORY: If your answer to interrogatory numbered Eighth is in the affirmative, state when and where you wrote the manuscript therein contained?

TENTH INTERROGATORY: State the general nature and substance of said manuscripts contained in the said copybooks.

ELEVENTH INTERROGATORY: Was any portion or portions of any said manuscripts contained in said copybooks published?

TWELFTH INTERROGATORY: If your answer to interrogatory numbered Tenth is in the affirmative, state (a) the name or names of such publications, and (b) the date or dates of publication.

THIRTEENTH INTERROGATORY: Did you ever deliver any of the said copybooks to anyone?

FOURTEENTH INTERROGATORY: If your answer to interrogatory numbered Thirteenth is in the affirmative, did you ever deliver any of said copybooks to Esther J. Lichtmann and Nettie S. Horch, who are the defendants in this action?

FIFTEENTH INTERROGATORY: If your answer to interrogatory numbered Fourteenth is in the affirmative, did you have any conversation or conversations concerning said copybooks with Esther J. Lichtmann at or prior to the time or times when you delivered any of the said copybooks to her?

SIXTEENTH INTERROGATORY: If your answer to interrogatory numbered Fifteenth is in the affirmative, state (a) the place or places where such conversation or conversations took place; (b) the date or dates when such conversation or conversations took place; (c) what was said by you and what was said by Esther J. Lichtmann in such conversation or conversations; and (d) what, if anything, took place at or following said conversation or conversations.

SEVENTEENTH INTERROGATORY: If your answer to interrogatory numbered Fourteenth is in the affirmative, did you have any conversation or conversations concerning said copybooks with Nettie S. Horch at or prior to the time or time you delivered any of the said copybooks to her?

EIGHTEENTH INTERROGATORY: If your answer to interrogatory numbered Seventeenth is in the affirmative, state (a) the place or places where such conversation or conversations took place; (b) the date or dates when such conversation or conversations took place; (c) what was said by you and what was said by Nettie S. Horch in such conversations; and (d) what, if anything, took place at or following said conversation or conversations.

NINETEENTH INTERROGATORY: Did you ever deliver any of the said copybooks to Nettie S. Horch or Esther J. Lichtmann, except by delivering them directly to either or both of said persons?

TWENTIETH INTERROGATORY: If your answer to interrogatory numbered Nineteenth is in the affirmative, state (a) the number of said copybooks, (b) the dates when, and (c) the names of the persons by whom, you delivered the said copybooks to Nettie S. Horch or Esther J. Lichtmann.

TWENTY-FIRST INTERROGATORY: Were you present at a meeting of certain Trustees of Roerich Museum at Naggar, Kulu, Punjab, British India, on April 28, 1931?

TWENTY-SECOND INTERROGATORY: If your answer to interrogatory numbered Twenty-First is in the affirmative, state who besides yourself was present at said meeting?

TWENTY-THIRD INTERROGATORY: If your answer to interrogatory numbered Twenty-Second is in the affirmative, was anything said or done at said meeting concerning the said copybooks, the subject of this action?

TWENTY-FOURTH INTERROGATORY: If your answer to interrogatory numbered Twenty-First is in the affirmative, what was said or done at said meeting concerning said copybooks?

TWENTY-FIFTH INTERROGATORY: Did you ever instruct anyone on your behalf to make demand for the return to you of the said copybooks?

TWENTY-SIXTH INTERROGATORY: If your answer to the Twenty-Fifth interrogatory is in the affirmative, state the name of the person whom you so instructed.

TWENTY-SEVENTH INTERROGATORY: Have any of the said copybooks been returned to you?

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
HELENA ROERICH,
Plaintiff
-against-
NETTIE S. HORCH and ESTHER J. LICHTMANN,
Defendants.
-----X

S I R S:

PLEASE TAKE NOTICE that the enclosed are the interrogatories proposed on behalf of the defendants in pursuance of the order made and entered on September 3, 1937.

Dated, November 5, 1937.

Yours, etc....
GREENBAUM, WOLFF & ERNST
Attorneys for Defendants
Office & P.O. Address
285 Madison Avenue,
Borough of Manhattan
City of New York.

TO: PLAUT & DAVIS, Esqs.,
Attorneys for Plaintiff
76 Beaver Street
Borough of Manhattan
City of New York

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
HELENA ROERICH,
Plaintiff
-against-
NETTIE S. HORCH and ESTHER J. LICHTMANN
Defendants.
-----X

DEFENDANTS' CROSS-INTERROGATORIES

1. Are you a citizen of the United States?
2. If your answer to Interrogatory No. 1 is in the negative, of what country are you a citizen?
3. What is your present residence?
4. What is the total number of copy books and/or manuscript diaries in your handwriting that you made?
5. Did you make or did you cause to be made any exact duplicates of all of the copy books and/or manuscript diaries which are the subject of this action?
6. Did you make or cause to be made duplicates of any part of the copy books and/or manuscript diaries which are the subject of this action?

7. If your answer to Interrogatory No. 5 is in the affirmative, state how many duplicates or copies were made of the copy books and/or manuscript diaries which are the subject of this action?

8. If your answer to Interrogatory No. 5 is in the affirmative, describe in detail those copy books and/or manuscripts diaries which were duplicated, by giving the general content of the entire copy book and/or manuscript diary duplicated, the general appearance of the copy books and/or manuscript diaries, and the dates over which the same covered.

9. If your answer to Interrogatory No. 6 is in the affirmative, state how many duplicates or copies were made of any part of the copy books and/or manuscript diaries which are the subject of this action.

10. If your answer to Interrogatory No. 6 is in the affirmative, describe in detail those parts of the copy books and/or manuscripts diaries which were duplicated, by giving the general content of that part of the copy book and/or manuscript diary duplicated, the general appearance of the copybooks and/or manuscript diaries, and the dates over which the same covered.

11. If your answer to Interrogatory No. 5 is in the affirmative, state in whose handwriting duplicates were made.

~~10. If your answer to Interrogatory No. 5 is in the affirmative, state in whose handwriting duplicates were made, state how many duplicates of each copy book and/or manuscript diary was made.~~

~~12. If your answer to Interrogatory No.~~
12. If your answer to Interrogatory No. 5 is in the affirmative, state how many duplicates of each copy book and/or manuscript diary were made.

13. If your answer to Interrogatory No. 6 is in the affirmative, state in whose handwriting duplicates were made.

14. If your answer to Interrogatory No. 6 is in the affirmative, state how many duplicate of each part of each copy book and/or manuscript diary was made.

15. If your answer to Interrogatory No. 5 or Interrogatory No. 6 is in the affirmative, state how the duplicates were made.

16. If your answer to Interrogatory No. 5 or Interrogatory No. 6 is in the affirmative, state whether carbon paper was used in making the duplicates.

17. If your answer to Interrogatory No. 5 or Interrogatory No. 6 is in the affirmative, do you still have in your possession any part of the copy books and/or manuscript diaries?

18. If your answer to Interrogatory No. 17 is in the affirmative, state which original copy books and/or manuscript diaries you still have in your possession by describing the general content of the copy books and/or manuscript diaries, the general appearance of the copy books and/or manuscript diaries, and the dates over which the same cover.

19. If your answer to Interrogatory No. 5 or Interrogatory No. 6 is in the affirmative, state whether you have any of the duplicate copy books and/or manuscript diaries in your possession at the present time.

20. If your answer to Interrogatory No. 19 is in the affirmative, state which duplicate copy books and/or manuscript diaries are in your possession by describing the general content of the copy books and/or manuscript diaries, the general appearance of the copy books and/or manuscript diaries, and the dates over which the same cover

21. Is it claimed that the defendant Nettie S. Horch has the original copy books and/or manuscript diaries?

22. Is it claimed that the defendant Nettie S. Horch has part of the original copy books and/or manuscript diaries?

23. If your answers to Interrogatories No. 21 or No. 22 are in the affirmative, describe which copy books and/or manuscript diaries it is claimed the defendant Nettie S. Horch has in her possession.

24. Is it claimed that the defendant Esther J. Lichtmann has the original copy books and/or manuscript diaries?

25. Is it claimed that the defendant Esther J. Lichtmann has all of the original copy books and/or manuscript diaries?

26. Is it claimed that the defendant Esther J. Lichtmann has part of the original copy books and/or manuscript diaries?

27. If your answer to Interrogatories No. 25 and No. 26 are in the affirmative, describe which copy books and/or manuscript diaries it is claimed the defendant Esther J. Lichtmann has in her possession.

28. If your answer above given indicate that you do not claim that Nettie S. Horch and Esther J. Lichtmann have all or any part of the original copy books and/or manuscript diaries, who, is it claimed, now possesses all of the original copy books and/or manuscript diaries?

29. If your answers above given indicate that you do not claim that Nettie S. Horch and Esther J. Lichtmann have all or any part of the original copy books and/or manuscript diaries, who, is it claimed by you, now possesses part of the original copy books and/or manuscript diaries?

30. If your answers given above indicate that other persons besides the defendants herein possess at the present time all or any part of the original copy books and/or manuscript diaries, describe in detail such original copy books and/or manuscript diaries possessed by the person or persons indicated by giving the general content of the copy books and/or manuscript diaries, the general appearance of the copy books and/or manuscript diaries, and the dates over which the same cover.

31. If your answers to Interrogatories No. 5 and No. 6 are in the affirmative, state whether it is claimed that Nettie S. Horch has duplicates of the original copy books and/or manuscript diaries.

32. If your answer to Interrogatory No. 31 is in the affirmative, state whether you claim that Nettie S. Horch has a complete set of the duplicate originals of the copy book and/or manuscript diaries.

33. If your answer to Interrogatory No. 31 is in the affirmative, state whether it is claimed that the defendant Nettie S. Horch has only a part of the duplicate originals of the original copy books and/or manuscript diaries in her possession.
34. If your answer to Interrogatory No. 31 is in the affirmative, describe in detail exactly which duplicates of the original copy books and/or manuscript diaries are in her possession.
35. If your answers to Interrogatories No. 5 and No. 6 are in the affirmative, state whether it is claimed that Esther J. Lichtmann has duplicates of the original copy books and/or manuscript diaries.
36. If your answer to Interrogatory No. 35 is in the affirmative, state whether you claim that Esther J. Lichtmann has a complete set of the duplicate originals of the copy book and/or manuscript diaries.
37. If your answer to Interrogatory No. 35 is in the affirmative, state whether it is claimed that the defendant Esther J. Lichtmann has only a part of the duplicate originals of the original copy books and/or manuscript diaries in her possession.
38. If your answer to Interrogatory No. 35 is in the affirmative, describe in detail exactly which duplicates of the original copy books and/or manuscript diaries are in her possession.
39. If your answers given above indicate that the originals or part of the original copy books and/or manuscript diaries were given to Nettie S. Horch, when were each or all of them so given?
40. If your answers given above indicate that the originals or part of the original copy books and/or manuscript diaries were given to Nettie S. Horch, where and under what circumstances were each or all given to Nettie S. Horch?
41. If your answers given above indicate that the originals or part of the original copy books and/or manuscript diaries were given to Esther J. Lichtmann, when were each or all of them so given?
42. If your answers given above indicate that the originals or part of the original copy books and/or manuscript diaries were given to Esther J. Lichtmann, where and under what circumstances were each or all given to Esther J. Lichtmann?
43. If your answers to Interrogatories No. 5 and No. 6 are in the affirmative, state whether it is claimed that Nettie S. Horch has duplicate of all or of part of the copy books and/or manuscript diaries.
44. If your answers to Interrogatories No. 5 and No. 6 are in the affirmative, state whether it is claimed that Esther J. Lichtmann has duplicates of all or of part of the copy books and/or manuscripts/diaries.
45. Were any of the copy books and/or manuscript diaries which are the subject of this action, published?
46. If your answer to Interrogatory No. 45 is in the affirmative, describe which of the copy books and/or manuscript diaries were published.

47. If your answer to Interrogatory No. 45 is in the affirmative state whether any of the copy books and/or manuscript diaries were wholly published.
48. If your answer to Interrogatory No. 45 is in the affirmative, state whether just parts of the copy books and/or manuscript diaries were published.
49. If your answer to Interrogatory No. 45 is in the affirmative, describe which of the copy books and/or manuscript diaries were published, describing each of said copy books and/or manuscript diaries by their appearance, general content, dates covered and describe in particular the part or parts of such copy book and/or manuscript diary so published.
50. If your answer to Interrogatory No. 45 is in the affirmative, state whether such publications of part or all of the copy books and/or manuscript diaries were sold to the general public.
51. I show you a lavender book approximately 4-3/4" x 6-1/4", entitled "Hierarchy" bearing date on the outside cover "1931", copyrighted in 1933, printed in the United State of America and containing on the third page of the said book, the following "Signs of Agni Yoga" and ask you whether such book is a publication of any part of any of the copy books and/or manuscript diaries.
52. If your answer to Interrogatory No. 51 is in the affirmative, state whether such publication entitled "Hierarchy" is a part of one copy book and/or manuscript diary.
53. If your answer to Interrogatory No. 51 is in the affirmative, state whether such publication entitled "Hierarchy" contains parts of more than one copy book and/or manuscript diary in the same form.
54. If your answer to Interrogatory No. 51 is in the affirmative, state whether such publication entitled "Hierarchy" contains all of one copy book and/or manuscript diary.
55. If your answer to Interrogatory No. 51 is in the affirmative, state whether such publication entitled "Hierarchy" contains the contents of more than one complete copy book and/or manuscript diary.
56. If your answer ~~min~~ to Interrogatory No. 51 is in the affirmative, describe the copy book and/or manuscript diary by giving its general appearance, general content and dates covered.
57. If your answer to Interrogatory No. 51 is in the affirmative, the publication "Hierarchy" bearing date on the outside cover "1931", copyrighted in 1933, printed in the United State of America and containing on the third page of the said book the following "Signs of Agni Yoga", said book being approximately 4-3/4" x 6-1/4", is herewith offered in evidence.
58. I show you a blue book approximately 4-3/4" x 6-1/4", entitled "Agni Yoga" bearing date on the outside cover "1931" copyrighted in 1929 and 1930, printed in the United State of America and containing on the third page a statement as to "The Blessed Mahatma", and ask you whether such book is a publication of any part of any of the copy books and/or manuscript diaries?

59. If your answer to Interrogatory No. 58 is in the affirmative, state whether such publication entitled "Agni Yoga" is a part of one copy book and/or manuscript diary.
60. If your answer to Interrogatory No. 58 is in the affirmative, state whether such publication entitled "Agni Yoga" contains parts of more than one copy book and/or manuscript diary in the same form.
61. If your answer to Interrogatory No. 58 is in the affirmative, state whether such publication entitled "Agni Yoga" contains all of one copy book and/or manuscript diary.
62. If your answer to Interrogatory No. 58 is in the affirmative, state whether such publication entitled "Agni Yoga" contains the contents of more than one complete copy book and/or manuscript diary.
63. If your answer to Interrogatory No. 58 is in the affirmative, describe the copy book and/or manuscript diary by giving its general appearance, general content and dates covered.
64. If your answer to Interrogatory No. 58 is in the affirmative, the publication "Agni Yoga" bearing date on the outside cover "1931", copyrighted in 1929 and 1930, printed in the United States of America and containing on the third page a statement as to "The Blessed Mahatma", being approximately 4-3/4" x 6-1/4", is herewith offered in evidence.
65. I show you a yellow book approximately 4-3/4" x 6-1/4" entitled "Heart", bearing date on the outside cover "1932", copyrighted in 1934, printed in the United States of America and containing on the third page of the said book, the following "Signs of Agni Yoga", and ask you whether such book is a publication of any part of any of the copy books and/or manuscript diaries ?
66. If your answer to Interrogatory 65 is in the affirmative, state whether such publication entitled "Heart" is a part of one copy book and/or manuscript diary.
67. If your answer to Interrogatory 65 is in the affirmative, state whether such publication entitled "Heart" contains parts of more than one copy book and/or manuscript diary in the same form.
68. If your answer to Interrogatory No. 65 is in the affirmative, state whether such publication entitled "Heart" contains all of one copy book and/or manuscript diary.
69. If your answer to Interrogatory No. 65 is in the affirmative, state whether such publication entitled "Heart" contains the contents of more than one complete copy book and/or manuscript diary.
70. If your answer to Interrogatory No. 65 is in the affirmative, describe the copy book and/or manuscript diary by giving its general appearance, general content and dates covered.
71. If your answer to Interrogatory No. 65 is in the affirmative, the publication "Heart" bearing date on the outside cover "1932", copyrighted in 1934, printed in the United State of America and containing on the third page of the said book, the following "Signs of Agni Yoga", being approximately 4-3/4" x 6-1/4", is herewith offered in evidence.

72. ~~72.~~ I show you a purplish grey book, approximately 4-3/4" x 6", entitled "Leaves of Morya's Garden", special translation copyrighted 1923, printed in New York, and ask you whether such book is a publication of any part of any of the copy books and/or manuscript diaries?

73. If your answer to Interrogatory No. 72 is in the affirmative, state whether such publication entitled "Leaves of Morya's Garden" is a part of one copy book and/or manuscript diary.

74. If your answer to Interrogatory No. 72 is in the affirmative, state whether such publication entitled "Leaves of Morya's Garden" contains parts of more than one copy book and/or manuscript diary in the same form.

75. If your answer to Interrogatory No. 72 is in the affirmative, state whether such publication entitled "Leaves of Morya's Garden" contains all of one copy book and/or manuscript diary.

76. If your answer to Interrogatory No. 72 is in the affirmative, state whether such publication entitled "Leaves of Morya's Garden" contains the contents of more than one complete copy book and/or manuscript diary.

77. If your answer to Interrogatory No. 72 is in the affirmative, describe the copy book and/or manuscript diary by giving its general appearance, general content and dates covered.

78. If your answer to Interrogatory No. 72 is in the affirmative, the publication "Leaves of Morya's Garden", special translation copyrighted 1923, printed in New York, being approximately 4-3/4" x 6", is herewith offered in evidence.

79. Are the copy books and/or manuscript diaries which are the subject of this action, the record of your personal and private activities?

80. If your answer to Interrogatory No. 51 is in the affirmative, state in whose name the copyright was obtained.

81. If your answer to Interrogatory No. 51 is in the affirmative, state in what country the copyright was obtained.

82. If your answer to Interrogatory No. 58 is in the affirmative, state in whose name the copyright was obtained.

83. If your answer to Interrogatory No. 58 is in the affirmative, state in what country the copyright was obtained.

84. If your answer to Interrogatory No. 65 is in the affirmative, state in ~~in whose name the copyright was obtained.~~ in whose name the copyright was obtained.

85. If your answer to Interrogatory No. 65 is in the affirmative, state in what country the copyright was obtained.

86. If your answer to Interrogatory No. 72 is in the affirmative, state in whose name the copyright was obtained.

87. If your answer to Interrogatory No. 72 is in the affirmative, state in what country the copyright was obtained.

88. Did Nettie S. Horch, one of the defendants in this action, ever lend you any money?

89. If your answer to Interrogatory No. 88 is in the affirmative, how much money was loaned, giving the dates of each loan?
90. If your answer to Interrogatory No. 88 is in the affirmative, were any of said loans repaid by you to Nettie S. Horch?
91. Did Louis L. Horch, the husband of Nettie S. Horch, ever lend you any money?
92. If your answer to Interrogatory No. 91 is in the affirmative, then give the exact amount of each loan and the dates when the sums were loaned.
93. If your answer to Interrogatory No. 91 is in the affirmative, state whether any of the loans have been repaid by you to Louis L. Horch.
94. Did Nettie S. Horch, the defendant in this action, give any moneys or things of value to you?
95. If your answer to Interrogatory No. 94 is in the affirmative, state exactly what was given and the dates and place when each was given.
96. Did Louis L. Horch, the husband ^{hand} of the defendant Nettie S. Horch, ever give any money or things of value to you?
97. If your answer to Interrogatory No. 96 is in the affirmative, state exactly what was given and the date and place each item was given.
- 98.
98. Did Louis L. Horch and/or Nettie S. Horch ever lend any moneys to your husband, Nicholas Roeruch?
99. If your answer to Interrogatory No. 98 is in the affirmative, state the amount of such loans and the dates when such loans were made.
100. If your answer to Interrogatory No. 98 is in the affirmative, state whether any such loans were repaid and give the dates of repayment.
101. Did Louis L. Horch and/or Nettie S. Horch ever give any money or things of value to you or your husband?
102. If your answer to Interrogatory No. 101 is in the affirmative, state exactly what was given and the date and place on which each item was given.
103. In the copy books and or manuscript diaries, which are the subject of this action, do any of the same or any part of the same refer to "A Mahatma of the East"?
104. If your answer to Interrogatory No. 103 is in the affirmative, please state who the "Mahatma of the East" is or was.
105. In the copy books and/or manuscript diaries, which are the subject of this action, do any of the same or any part of the same refer to "Urusvati"?
106. If your answer to Interrogatory No. 105 is in the affirmative, state what or who "Urusvati" is or was.

107. In the copy books and/or manuscript diaries, which are the subject of this action, do any of the same or any part of the same refer to "M.M."?
108. If your answer to Interrogatory No. 107 is in the affirmative, state who or what "M.M." is.
109. Were any part of the copybooks and/or manuscript diaries, which are the subject of this action, devoted to a discussion of or compilation of spiritualistic seances?
110. Were any part of the copy books and/or manuscript diaries which are the subject of this action, devoted to discussing the technique of seances?
111. Were any part of the copy books and/or manuscript diaries, which are the subject of this action, devoted to a discussion of occult names?
112. Were any part of the copy books and/or manuscript diaries, which are the subject of this action, devoted to prophesies and/or prediction of events to occur in the future?
113. Were any part of the copy books and/or manuscript diaries, the subject of this action, devoted to a discussion of the government of any presently existing country.
114. Do any of the copybooks and/or manuscript diaries, which are the subject of this action, contain any reference to "Fujama" or "Fuyama"?
115. If your answer to Interrogatory No. 114 is in the affirmative, state who "Fujama" or "Fuyama" is?