

reach the factory until about 8 A.M. Deponent says that, after making application to Miss Flowers for a position, Miss Nellie immediately left the factory; and deponent is sure that Miss Nellie did not at any time come in contact with Mr. Frank and is further sure that if she had seen him in the factory, she would not have known him, as deponent had never at any time pointed out Mr. Frank to her, and Miss Nellie had never told her that she knew Mr. Frank.

Deponent also says that Miss Nellie never stated to her that she had ever been insulted at the factory by Mr. Frank, or anyone else, and says, further, that the first time she ever heard Miss Nellie say that Mr. Frank had insulted her was on the occasion of the first visit of Detective Bass Risser at her home at No. 9 Oliver Street, when Mr. Rosser had called upon deponent asking her to swear against Mr. Frank; and says, that during the conversation between deponent and Mr. Rosser, that Miss Nellie was present and interrupted the conversation by stating to Mr. Rosser that she could tell something against Mr. Frank. Deponent says that Mr. Rosser immediately dropped his conversation with her and applied his attention to Miss Nellie. Deponent says that she heard Miss Nellie tell Mr. Rosser that, on one occasion when she had been sent by deponent to the Pencil Factory to get deponent's salary, that Mr. Frank had winked at her and asked her: "How about it?" Deponent says that there was another man with Mr. Rosser, on the occasion of the conversation referred to; that she does not know who this man was, but that he took a statement from Miss Nellie, which was signed by Miss Nellie in deponent's presence. Deponent further says that after detective Bass Rosser and the man with him left their home, she said to Miss Nellie: "It is very peculiar that you never before mentioned about Mr. Frank, or anyone else, had insulted you while at the Pencil Factory." Deponent says that Miss Nellie replied that she had decided to keep the matter to herself and admitted that she never mentioned it before telling it to detective Bass Rosser.

(Signed) Lillie Pettis

Sworn to and subscribed before me
this 0th day of October, 1913,
(Signed) C.W. Burke,
Notary Public, Fulton County, Ga."

(Exhibit C is an exact copy of the above affidavit, except that it is entitled in the case and is signed before J.O. Knight, on April 9, 1914.)

C. W. BURKE, Sworn for the Movant. I have read the affidavit of Carrie Smith, known as No. 2 9410, dated April 20, 1914, and sworn to before W.F. Young, Notary Public. Never at any time since I was engaged upon the case of Leo M. Frank have I promised any person or persons money, or a fee of any kind, for giving evidence or making affidavits of any nature whatever, or that at any time I have used assumed names. I never at any time used the assumed name of Maddox and while I have taken affidavits from Carrie Smith, I did so under my own name, and most positively did not promise her anything or offer her any reward for making the affidavits referred to.

J. W. WREN, Sworn for the Movant. I have never been in the employ of Leo M. Frank or Frank's counsel, and never until today have I ever been in the private office of L.Z. Rosser, or spoken to Mr. Rosser about the Frank case until this day, nor did either Mr. Rosser or Mr. Brandon know me by sight until this day. I have