

## AFFIDAVIT OF BENJAMIN M. PLUMB.

B. M. PLUMB, of the City and County of New York, being duly sworn, deposes and says:

That on or about the 5th day of October, 1881, Mr. Erastus Wiman came to the office of the company of which I am President, and stated that he was the President of the Great North-Western Telegraph Company, controlling every mile of telegraph wire in the Canadas and Manitoba, and was representing the Western Union Telegraph Company; that there were certain documents or papers in existence belonging to the Mutual Union Telegraph Company, copies of which the Western Union Telegraph Company and himself were extremely desirous of possessing, and certain other information they desired to obtain. I asked him what were the documents and information they desired, and he told me that one document was the contract for the construction of the lines of the Mutual Union Telegraph Company, and any information reflecting upon the management of the Mutual Union Telegraph Company, or the private character or business of the officers thereof. I then stated to him that I knew the general officers of said company, and also a clerk in the employ of John G. Moore & Company, contractors for the construction of the lines of the Mutual Union Telegraph Company, who might help him get information if he would consent to do so. He asked if this clerk could probably get at the papers of the firm, and stated that he would pay said clerk well, if he would possess himself of the original of said contract, and make and deliver a copy thereof, and that he would besides, in case the clerk was found out and discharged in consequence of his acts, furnish him employment at a compensation equal to that he was then receiving from said John G. Moore & Company, and would also pay me \$500 if the copy was obtained. I was astounded that Mr. Wiman should make such a proposition to me, but did not let my surprise be apparent to him. One George E. Baker, now in the employ of the Western Union Telegraph Company, and formerly of the Mutual Union Telegraph Company, had, previous to Mr. Wiman's coming to my office as aforesaid, been to me, and after asking me many questions touching the Mutual Union Telegraph Company, said there was certain information touching the Mutual Union Telegraph Company that he thought I possessed wanted by "a big man," and that he would bring said man to my office within two days. Curious to know what was sought after, I humored Baker in this, and when Mr. Wiman came, as above, said Baker accompanied him.

Mr. Wiman also stated to me that one of the reasons for their desiring to get possession of these papers and facts was to endeavor to create a stink here in the newspapers in New York and this country as against the Mutual Union Telegraph Company, for the purpose of impairing their credit and deterring the public from paying subscriptions, and if he could create this disaffection here, they could, by publishing the same in Canada, as they should, make such a feeling against the Mutual Union Telegraph Company there as that its Canadian alliance (called the Canada Mutual Telegraph Company) would be unable to get any subscriptions in Canada for the said last-named Company's uses. He stated that the Canadians were a peculiar people, and that when the disaffection he proposed to produce here in the public prints, and otherwise, was accomplished, the Canadian people would not touch the matter of subscribing to said Canada Mutual Union Tele-