Maryland, Queen Anne's County Set. At a County Court of the Second Judicial District of the State of Maryland, begun & held at Centre Ville, in and for Queen Anne's County aforesaid on the first Monday of May in the Year of our Lord Eighteen hundred and twelve and in the thirty sixth Year of the Independence of the United States of America —

Were Present

The Hon'ble { Richard T. Earle Esquire Chief Judge
Lemuel Purnell } Esquires Associate Judges
Thomas Worrell }

William C. Ridgaway Esquire Sheriff

John Browne Clk

In the Record of Proceedings of the Said Court, amongst other things, were the following to wit

Robert Moody
against
Richard J. Jones

Be it remembered, that on the first Monday in May in the year of Our Lord One thousand Eight hundred and three; Negro Robert Moody by William Carmichael his Attorney exhibited to the Court here sitting his Petition for Freedom against Richard J. Jones in form following to wit — To the Hon'ble the Justices of Queen Anne's County Court — The Petition of Robert Moody humbly Sheweth, that Your petitioner is lineally descended in the female Line from an Indian Woman a Native of America and tho' born free is unjustly held in Slavery by Richard J. Jones of Queen Anne's County. Your Petitioner therefore prays process against the Said Richard J. Jones to answer the premises & that he be otherwise redressed as to Your Honors may seem right and he as in duty bound will pray &c.

Wm Carmichael for Petitioner

And the said Richard J. Jones by Lemuel Purnell his Attorney appears in Court here, and defends the Complaint aforesaid when and where the Court will take the same into consideration, and prays leave of the Court here to imparle until the fourth Monday in October next, and to him it is granted the same day is given to the Said Robert Moody also — at which said fourth Monday in October in the year of Our Lord One thousand ~~seven~~ eight hundred and three, comes

again

again into the Court here, as well the said Robert Moody by his At=
=torney aforesaid as the said Richard J. Jones by his Attorney aforesaid
And the said Richard J. Jones by his Attorney aforesaid, as before
defends the complaint aforesaid when & where & so forth. Thereupon
further process of and upon the Promises aforesaid, between the
parties aforesaid, by consent of the said parties and their Attornies afs
and by Order of the Court here thereon is further continued until the
first Monday in May next. At which said first Monday in May in
the year Eighteen hundred and four comes again into the Court here
the said Robert Moody by his Attorney aforesaid, as the said Richard
J. Jones by his Attorney aforesaid, as before defends the complaint afs
when & where aforesaid, and prays leave of the Court here to im=
=parle until the fourth Monday in October next, and to him it is
granted, the same day is given to the said Robert Moody also.
Thereupon further process of and upon the Promises aforesaid, between
the parties aforesaid, by consent of the said parties and their Attornies
aforesaid, and by Order of the Court here thereon, is further continued
until the fourth Monday in October next. At which said fourth Monday
in October in the year Eighteen hundred and four comes again into the
Court, as well the said Robert Moody by his Attorney aforesaid, as the said
Richard J. Jones by his Attorney aforesaid. And the said Richard J.
Jones by his Attorney aforesaid as before defends the complaint aforesaid
when & where & so forth & prays leave of the Court here to imparle until the
first Monday in May next and to him it is given, the same day is
given to the said Robert Moody also. Thereupon further process of
and upon the Promises aforesaid between the parties aforesaid, by consent
of the said parties and their Attornies aforesaid, and by Order of the
Court here thereon, is further continued until the first Monday of May
next. At which said first Monday of May in the year Eighteen
hundred and five comes again into the Court here as well the said
Robert Moody by his Attorney aforesaid, as the said Richard J. Jones by
his Attorney aforesaid ~~as before~~ And the said Richard J. Jones by his
Attorney aforesaid as before defends the complaint aforesaid when & so
forth & prays leave of the Court here to imparle until the fourth
Monday in October next and to him it is granted, the same day
is given to the said Robert Moody also: Thereupon further process of &
upon the Promises aforesaid between the parties afs, by consent of the

said parties and their Attornies aforesaid and by order of the Court here
thereon, is further continued until the ~~second~~ fourth Monday of October
next. At which said fourth Monday in October in the year of our
Lord Eighteen hundred and five comes again into the Court here
as well the said Robert Moody by his Attorney aforesaid, as the said
Richard J. Jones by his Attorney aforesaid, as before defends the
complaint aforesaid when & where & so forth, and prays leave of the
Court here to imparle until the first Monday of May next, & to
him it is granted, the same day is given to the said Robert
Moody also. Thereupon further process of and upon the Promises afs
between the parties afs, by consent of the said parties and their
Attornies afs, and by order of the Court here thereon, is further
continued until the first Monday in May next. At which said
first Monday in May in the year of our Lord Eighteen hundred and
five comes again into the Court here, as well the said Robert Moody
by his Attorney aforesaid, as the said Richard J. Jones by his Attorney
aforesaid: And the said Richard J. Jones by his Attorney aforesaid as before
defends the complaint aforesaid when & so forth & prays leave of the Court
here to imparle until the fourth Monday in October next & to him
it is given, the same day is given to the said Robert Moody also:
Thereupon further process of and upon the Promises aforesaid between
the parties aforesaid, by consent of the said parties and their Attornies
aforesaid, and by Order of the Court here thereon is further continu=
=ed until the fourth Monday in October next. At which said fourth
Monday in October in the year of our Lord Eighteen hundred and five
comes again into the Court here, as well the said Robert Moody by
his Attorney afs, as the said Richard J. Jones by his Attorney aforesaid:
And the said Richard J. Jones by his Attorney aforesaid as before defends
the complaint aforesaid when & so forth and prays leave of the Court
here to imparle until the first Monday in May next & to him it is
given, the same day is given to the said Robert Moody also. There=
=upon further process of and upon the Promises aforesaid between the
parties aforesaid, by consent of the said parties and their Attornies
aforesaid, and by Order of the Court here thereon is further continued
until the first Monday in May next. At which said first Monday
in May in the year Eighteen hundred and Six comes again into Court
here the aforesaid Robert Moody by his attorney aforesaid, whereupon it is ruled

by

by the said Court hereof that the said Richard J. Jones do employ new Coun=
=sel, the Honble Samuel Purnell Esqr having been appointed One of the Associate
Judges of the aforesaid Court. Thereupon further process of & upon the premises
aforesaid, between the parties aforesaid, by Order of the Court here thereon is further
continued until the ~~second Monday~~ fourth Monday in October next. At
which said fourth Monday in October in the year of Our Lord Eighteen
hundred and Six, comes again into the Court here, as well the said
Robert by his Attorney aforesaid, as the said Richard J. Jones in his own
proper person, whereupon it is further ruled by the aforesaid Court
here that the said Richard J. Jones do employ new Counsel in the
place of Samuel Purnell Esqr his former Counsel. Thereupon further
process of & upon the premises aforesaid, between the parties aforesaid
by Order of the Court here thereon is further continued until the first
Monday in May next. At which said ~~fourth~~ first Monday of May
in the year of our Lord Eighteen hundred and Seven, comes again into
the Court here, as well the said Robert Moody by his Attorney aforesaid
as the said Richard J. Jones by his Solicitor and Attorney ~~aforesaid~~ And the said Richard
J. Jones by his Attorney aforesaid, as before defends the complaint aforesaid
when & where the Court will take the same into consideration & prays
leave of the Court here further to imparle until the fourth Monday in
October next and to him it is granted, the same day is given to the said
Robert Moody also. Thereupon further process of & upon the premises afore
=said, between the parties aforesaid, by consent of the said parties and their
Attorneys aforesaid, and by Order of the said Court here thereon, is further
continued until the said fourth Monday in October next. At which said
fourth Monday in October in the year of our Lord Eighteen hundred and
Seven, comes again into the Court here, as well the said Robert Moody
by his Attorney aforesaid as the said Richard J. Jones by his Attorney aforesaid
And the said Richard J. Jones by his Attorney aforesaid, as before defends the
complaint aforesaid when & where the Court will take the same into con=
=sideration & prays leave of the Court here further to imparle until the
~~third~~ first Monday in May next, and to him it is granted. The same day
is given to the said Robert Moody also. Thereupon further process of
& upon the premises aforesaid between the parties aforesaid, by consent
of the said parties and their attorneys aforesaid, and by Order of the Court
here thereon, is further continued until the ~~third~~ first Monday in May
next

At which said first Monday in May in the year of Our Lord E
hundred and Eight comes again into the Court here as well the
Robert Moody by his Attorney aforesaid as the said Richd J. Jones by
Attorney aforesaid: And the aforesaid Richd J. Jones by his Attorney af
as before defends the complaint aforesaid when & where the Court
take the same into consideration & prays leave of the Court
to imparle until the ~~fourth~~ third Monday of October next, and to him
is given, the same day is given to the said Robert Moody
At which said ~~fourth~~ third Monday in October in the year Eight
hundred and Eight comes again into the Court here, as well the
Robert Moody by his Attorney aforesaid, as the said Richard J. Jones
his Attorney aforesaid: And the said Richard J. Jones by his Attorn
as before defends the complaint aforesaid when & where the Court
take the same into consideration, and prays leave of the Court
further to imparle until the first Monday in May next, and to
it is granted, the same day is given to the said Robert Moody
Thereupon further process of & upon the premises aforesaid,
the parties aforesaid, by consent of the said parties and their attorneys
and by Order of the Court here thereon, is further continued
the first Monday in May next. At which said first Monday
May Eighteen hundred and Nine comes again into the Court he
as well the said Robert Moody by his Attorney aforesaid, as the
Richard J. Jones by his Attorney aforesaid: And the said Richard J.
by his Attorney aforesaid, as before defends the complaint afore
when & where the Court will take the same into consideration
prays leave of the Court here further to imparle until the fo
Monday of October next, and to him it is granted, the same
is given to the said Robert Moody also. At which said ~~fourth~~ third
in October in the year Eighteen hundred and Nine, comes again
the Court here as well the said Robert Moody by his Attorney
the said Richard J. Jones by his Attorney aforesaid, as before dofe
the complaint aforesaid when & where the Court will take the fa
into consideration & prays leave of the Court here further to im
until the first Monday in May next and to him it is granted,
same day is given to the said Robert Moody also. At which
said first Monday in May in the year of our Lord Eighteen hu

and ton comes again into Court here ~~the~~ as well the Said Robert Moody
by his Attorney aforesaid as the said Richard J Jones by his Attorney afsd
And the said Richard J. Jones by his Attorney afsd, as before defends the
~~Plaint~~ Complaint aforesaid when & where the Court will take the same
into consideration & prays leave of the Court here further to imparle
until the ~~fourth~~ third Monday of October next, and to him is given the
same day is also given to the said Robert Moody also. Thereupon
further process of and upon the promises aforesaid, between the parties
aforesaid, by consent of the said parties and their attornies afsd & by order
of the Court here thereon, is further continued until the ~~first~~ third Monday
of October next. At which said third Monday in October Eighteen
hundred and ton, comes again into the Court here, as well the said
Robert Moody by his Attorney as the said Richard J. Jones by his
Attorney afsd: and the said Richard J. Jones by his Attorney aforesaid
as before defends the ~~force~~ complaint aforesaid when & where &c. & prays
leave of the Court here further to imparle until the first Monday
of May next, and to him it is granted the same day is given to the
said Robert Moody also. Thereupon further process of and upon the
promises aforesaid, between the parties aforesaid by consent of the said
parties and their attornies aforesaid and by order of the Court here
thereon, is further continued until the first Monday of May next.
At which said first Monday in May in Eighteen hundred
and Eleven, comes again into the Court here, as well the said
Robert Moody by his Attorney aforesaid as the said Richard J Jones
by his Attorney aforesaid: And the said Richard J. Jones by his Attorney
aforesaid, as before defends the complaint aforesaid when & where the
Court will take the same into consideration and prays leave of the
Court here further to imparle until the third Monday of October
next, and to him it is granted, the same day is given to the
said Robert Moody also. Thereupon further process of and upon the
promises aforesaid, between the parties aforesaid, by consent of the
said parties and their attornies aforesaid, and by order of the Court
here thereon, is further continued until the third Monday in October
next. At which said third Monday of October in the year of our
Lord Eighteen hundred and Eleven, comes again into the Court
here as well the said Robert Moody by his Attorney aforesaid

as the said Richard J. Jones by his attorney aforesaid: And the said Richard
J. Jones by his attorney aforesaid, as before defends the ~~force~~ complaint afsd
when & where the Court will take the same into consideration &
prays leave of the Court here further to imparle until the
first Monday of May next, and to him it is granted, the same day
is given to the said Robert Moody also. Thereupon further process
of and upon the promises aforesaid, between the parties aforesaid, by
consent of the said parties and their attornies aforesaid, and by order
of the Court here thereon, is further continued until the first Monday
of May next. And now here at this day, that is to say the
first Monday of May in the year of our Lord Eighteen hundred
& twelve. Comes ~~here~~ into the Court here, as well the said Robert Moody
by his attorney aforesaid as the said Richard J. Jones by his attorney afsd
and the said Richard J. Jones by his attorney aforesaid, as before defends
the complaint aforesaid, and saith that the said Robert Moody
ought not to have or maintain his Petition against him, because
he saith that the said Robert Moody on the Day of proposing
the Petition in this cause was a Slave and of this he is ready to
verify: Wherefore he prays judgment if the said Robert Moody
ought to have or maintain his Petition against him & so forth &c.
And the said Robert Moody by his attorney aforesaid saith
that he by any thing by the said Richard J. Jones above in
pleading alledged ought not to be precluded from having and
maintaining his Petition aforesaid against him, because he saith
that he on the Day of proposing the Petition in this cause was a
free man and of free Condition, and not a Slave as the said
Richard J. Jones above in his plea hath alledged: and of this he
puts himself upon the Country: And the said Richard J. Jones in
like manner and so forth. Whereupon command is given to the
Sheriff of Queen Anne's County that he cause to come before the Court
here, twelve good and lawfull men of his Bailiwick, by whom and
so forth, and who neither & so forth. to recognize and so forth; because
as well and so forth: Which said Sheriff to wit William Pitt Rid-
=gaway Gentleman maketh return, that he hath here twelve
and so forth as he hath been commanded. which Jury being
called

and ten comes again into Court here ~~the~~ as well the said Robert Moody
by his Attorney aforesaid as the said Richard J. Jones by his Attorney afsd
And the said Richard J. Jones by his Attorney afsd, as before defends the
~~said~~ complaint aforesaid when & where the Court will take the same
into consideration & prays leave of the Court here further to imparle
until the ~~fourth~~ third Monday of October next, and to him is given the
same day is also given to the said Robert Moody also. Thereupon
further process of and upon the premises aforesaid, between the parties
aforesaid by consent of the said parties and their attornies afsd & by order
of the Court here thereon, is further continued until the ~~first~~ third Monday
of October next. At which said third Monday in October Eighteen
hundred and ten comes again into the Court here, as well the said
Robert Moody by his Attorney as the said Richard J. Jones by his
Attorney afsd: and the said Richard J. Jones by his Attorney aforesaid
as before defends the ~~said~~ complaint aforesaid when & where &c. & prays
leave of the Court here further to imparle until the first Monday
of May next, and to him it is granted the same day is given to the
said Robert Moody also. Thereupon further process of and upon the
premises aforesaid, between the parties aforesaid by consent of the said
parties and their attornies aforesaid and by order of the Court here
thereon, is further continued until the first Monday of May next.
At which said first Monday in May in Eighteen hundred
and Eleven, comes again into the Court here, as well the said
Robert Moody by his Attorney aforesaid as the said Richard J. Jones
by his Attorney aforesaid: And the said Richard J. Jones by his Attorney
aforesaid, as before defends the complaint aforesaid when & where the
Court will take the same into consideration and prays leave of the
Court here further to imparle until the third Monday of October
next, and to him it is granted, the same day is given to the
said Robert Moody also. Thereupon further process of and upon the
premises aforesaid, between the parties aforesaid, by consent of the
said parties and their attornies aforesaid, and by order of the Court
here thereon, is further continued until the third Monday in October
next. At which said third Monday of October in the year of our
Lord Eighteen hundred and Eleven comes again into the Court
here as well the said Robert Moody by his Attorney aforesaid

as the said Richard J. Jones by his attorney aforesaid: And the said Richard
J. Jones by his attorney aforesaid, as before defends the ~~same~~ complaint afsd
when & where the Court will take the same into consideration &
prays leave of the Court here further to imparle until the
first Monday of May next, and to him it is granted, the same day
is given to the said Robert Moody also. Thereupon further process
of and upon the premises aforesaid, between the parties aforesaid by
consent of the said parties and their attornies aforesaid, and by order
of the Court here thereon, is further continued until the first Monday
of May next. And now here at this day, that is to say the
first Monday of May in the year of our Lord Eighteen hundred
& twelve. Comes ~~here~~ into the Court here, as well the said Robert Moody
by his attorney aforesaid as the said Richard J. Jones by his attorney afsd
and the said Richard J. Jones by his Attorney aforesaid, as before defends
the complaint aforesaid, and saith that the said Robert Moody
ought not to have or maintain his Petition against him, because
he saith that the said Robert Moody on the Day of preferring
the Petition in this cause was a Slave and of this he is ready to
verify: Wherefore he prays judgment if the said Robert Moody
ought to have or maintain his Petition against him &c. & so forth.
And the said Robert Moody by his Attorney aforesaid saith
that he by any thing by the said Richard J. Jones above in
pleading alleged ought not to be precluded from having and
Maintaining his Petition aforesaid against him, because he saith
that he on the Day of preferring the Petition in this cause was a
free man and of free Condition, and not a Slave as the said
Richard J. Jones above in his plea hath alleged: and of this he
puts himself upon the Country: And the said Richard J. Jones in
like manner and so forth. Whereupon command is given to the
Sheriff of Queen Ann's County that he cause to come before the Court
here, twelve good and lawfull men of his Bailiwick, by whom and
so forth, and who neither & so forth. to recognize and so forth; because
as well and so forth: Which said Sheriff to wit William Pitt Rid-
=gaway Gentleman maketh return, that he hath here twelve
and so forth as he hath been commanded. which Jury being
called

called come; that is to say Nathan Baynard, Benjamin Walker, Richard
Cooke Tilghman, Joseph H. Nicholson, Thomas Wright of Thomas, John
King Beck Emory, ~~Robert Stevens~~ Robert Stevens, Thomas C. Earle
William Gilbert, Robert Olson, George Little & Thomas Emory, whereu-
-pon certain of them to wit Nathan Baynard, Benjamin Walker, Rich.
C. Tilghman, Joseph H. Nicholson, Thomas Wright of Thomas, John
H. B. Emory are sworn upon that Jury, and because the others
of the said Jurors, being according to the Act of Assembly challenged
by the Parties to wit, the said Robert Stevens, Thomas C. Earle
William Gilbert & Robert Olson on the part of the Petitioner
and the said George Little & Thomas Emory on the part of the
Defendant, other Jurors being called come that is to say William
Mayor, Daniel C. Hopper, Edmund Carvill, John R. Downes, James
Hackett & William Murphey, whereupon certain of them to wit William
Mayor, Daniel C. Hopper, Edmund Carvill are sworn upon that
Jury, and because others of the said Jurors last called as aforesaid
being according to the Act of Assembly challenged by the Parties aforesaid
to wit, the said James Hackett and William Murphey by the Petitioner
and the said John R. Downes by the Defendant, & because a Sufficient
Number of Jurors not being present to complete the said Panel, there-
-fore others of the by standers, by the Sheriff of the County aforesaid elected at
the Request of the said Petitioner and the said Defendant, and by
command of the Court here, are added to the said Panel, whose
names to the ~~said~~ Panel within written are annexed, according to the
form of the Statute in such case lately made & provided; and the Jurors
so added anew to wit Stephen Lowry of the Original Panel and
Thomas Gadd & William Legg Talesmen being called, likewise come
and the same being according to the Act of Assembly challenged
by the Parties aforesaid to wit Stephen Lowry & Thomas Gadd by the Petitioner
& William Legg on the part of the Defendant, & because a Sufficient
Number of Jurors not yet being present to complete the said
Panel, therefore others of by standers, by the Sheriff of the County
aforesaid elected as aforesaid and by command of the Court here, are added
to the said Panel, whose names to the said Panel within
written are annexed according to the form of the Statute &c.
lately made & provided; and the Jurors so added anew to wit
Charles McCollister, Henry Honey & George Godwin being called

like

likewise come whereupon Charles McCollister one of the aforesaid Jurors
being sworn upon that Jury, and because the others of the said
Jurors last called as aforesaid, being according to the Act of Assembly
challenged by the Parties aforesaid to wit Henry Honey and George
Godwin on the part of the Petitioner, and because a Sufficient
Number of Jurors not being still present to complete the said
Panel, therefore others of the by standers, by the Sheriff of the
aforesaid, elected as aforesaid, at the request of the Parties aforesaid
and by command of the Court here are added to the said Panel
whose names to the Panel within written are annexed, according to the
form of the Statute in such case made & provided, and the Jurors
so added anew to wit ~~Thomas Cooper~~ Richard Blackiston & James
Smith being called, likewise come, who to say the truth of the Pre-
-misses within contained, together with the other Jurors aforesaid first
empannelled and sworn, being elected, tried & sworn on their Oaths
to say the truth in the premises; upon their Oath do say that the said
Robert Moody on the day of preferring the Petition in this Cause
was a free Man and of free Condition as the Petitioner aforesaid in
his said Petition to the Court here preferred against the said
Richard J. Jones within hath alleged — Therefore it is considered
by the Court here, that the said Robert Moody the Petitioner aforesaid
recover his Freedom of and against the said Richard J. Jones and
that he be free and discharged of and from the Service of the said
Richard J. Jones, and that he the said Robert Moody go thereof
freed and discharged without day &c. it is also considered by the Court
here that the said Robert Moody the Petitioner aforesaid recover against
the said Richard J. Jones the Sum of One Hundred & five Dollars
Sixty three and one third Cents for the Costs and Charges of the
said Robert Moody which he hath laid out & expended in and
about the prosecution of the Petition aforesaid in this behalf: And
that he have his execution thereof against the said Richard J. Jones
& so forth —

Memorandum. ~~Only at the Trial of the aforegoing Cause The~~
~~Hon'ble Richard T. Earle Chief Judge and the Honorable Samuel Purnell~~
~~Associate Judge withdrew from the Bench, both having been previous~~
~~engaged~~

engaged as Counsel for the Petitioner & Respondent —

Memorandum. Before the Jurors aforesaid withdrew from the bar of the Court here, the said Respondent by his Attorney aforesaid tendered to the Court here his Bills of exceptions, and which was by the Court here signed and Sealed, and which is in form following to wit

And thereupon the said Richard S. Jones by his Attorney aforesaid prays an Appeal from the Judgment aforesaid so as aforesaid rendered, to the high Court of Appeals of the State of Maryland and it is granted him, by the Court here: Thereupon it is ordered by the Court here, that a record of the proceedings aforesaid with all things thereunto relating, be transmitted to the high Court of Appeals of the State of Maryland to be held at Easton in Talbot County on the first Monday of June Eighteen hundred and twelve, and they are transmitted accordingly —

Memorandum. At the Trial of the foregoing cause The Honorable Richard T. Earle chief Judge and the Honorable Samuel Purnell Associate Judge withdrew from the Bench both having been heretofore employed as Counsel for the Petitioner and Respondent —

Memorandum. Before the Jurors aforesaid withdrew from the Bar of the Court here, the said Respondent by his Counsel Attorney aforesaid tendered to the Court here, his Bills of exception and which was by the Court here signed and Sealed, and which is in form following to wit —

Robert Moody } Petition for Freedom

Richard S. Jones

At the Trial of this cause the Petitioner to support the issue on his part offered in evidence the Deposition of Elizabeth Chew having first proved her death as stated in the following record (without offering any proof of his being connected with or related to the person called Margaret therein mentioned) as proof of the pedigree of the said Petitioner. State of Maryland to wit

At a General Court begun and held for the Western Shore at the City of Annapolis on the Second Tuesday of October being the fourteenth day of the same Month in the year of our Lord one thousand seven hundred and sixty four and in the nineteenth year of the Independence of the United States of America —

Present

Samuel Chase Esquire Chief Judge

The honorable Robert Goldsborough } Esquires Judges
Jeremiah Townley Chase }

William Goldsmith Esquire Sheriff

John Gwinn Clerk

In the record of proceedings of the same Court, among others are the following third —

Thomas Carver } Be it remembered, That
against } on the Second Tuesday of
Samuel Lloyd Chew } May Anno Domini Seventeen hundred and sixty two

homas Carver by Gabriel Duvall his attorney exhibited
the General Court herein Court sitting, his petition
Freedom against Samuel Lloyd Chew in form follow-
, to wit,

To the Honorable the Judges of the General
ourt. The petition of Thomas Carver humbly
weth that he is held in Slavery by Samuel Lloyd
hew of Anne Arundel County, and he is advised that
is entitled to his freedom, being descended in the
male line from a free Indian Woman, he therefore
rays your Honors the premises being considered to
scharge him from the Custody of the said Samuel
loyd Chew should he prove his descent as aforesaid
d that Summons may issue from the Said Samuel
oyd Chew, to answer unto this petition returnable
mediately; And he will pray &c —

G Duvall for Pet.

Whereupon it is ordered by the Court here
at Samuel Lloyd Chew of Anne Arundel County
not remove the aforesaid Thomas Carver out
this State nor obstruct him from attending this
urt from time to time in support of his petition for
edom preferred against him the Said Samuel Lloyd Chew
in the mean time to feed Cloath and use the
d Petitioner well. And on Motion of the Said
homas Carver by his attorney aforesaid, It is order:
by the Court here that the writ of the State
Maryland of Subpoena issue to the Sheriff of
Anne Arundel County against the Said Samuel Lloyd
hew to Answer to the petition aforesaid of the

Said Thomas Carver; which accordingly issues in
form following, to wit, —

The State of Maryland ss. To the Sheriff of
Anne Arundel County Greeting: We command you
that you summon Samuel Lloyd Chew of Anne
Arundel County that all delays and excuses set
aside, he be and appear before the Judges of our
General Court now sitting at the City of Annapolis
to answer unto the petition of Thomas Carver, prefer-
red against him for freedom. Hereof he is
not to fail, and fail not at your peril, and
have you then and there this Writ Witness the
Honorable Samuel Chase Esquire Chief Judge of
our Said Court the 8th day of May Anno Domini
1792 Issued the 12th day of May 1792.

(Gd.) Mc Gwinn Clk

And the Sheriff of Anne Arundel County to whom
the Said Writ was in form aforesaid directed makes
return thereof to the Court here thus endorsed to wit

"Summoned W. Goldsmith Shff"

and the Said Samuel Lloyd Chew by William Cooke
and Philip Barton Esqrs his attorneys appears in
Court here and defends the Complaint aforesaid
when and where the Said Court will take the same
into Consideration and prays leave of the Court here
to imparle until the next Court; and he hath
it; And the same day is given to the petitioner
also —

At which said next Court to wit: the second Tuesday of October being the ninth day of the same Month in the year of our Lord one thousand seven hundred and ninety two, to which said day the said Thomas Carver had leave to imparle as aforesaid Comes again into the General Court here as well the aforesaid Thomas Carver by his Attorney aforesaid as the aforesaid Samuel Lloyd Chew by his Attorney aforesaid, and the aforesaid Samuel Lloyd Chew by his Attorney aforesaid, as before, defends the Complaint aforesaid when and where the Court will take the same into Consideration and prays leave of the Court to imparle until the Second Tuesday of May next; and to him it is granted; The same day is given to the said Petitioner also:

At which said Court to wit, the second Tuesday of May being the fourteenth day of the same Month in the year of our Lord one thousand seven hundred and ninety three, Comes again here into the General Court as well the aforesaid Thomas Carver by his Attorney aforesaid as the said Samuel Lloyd Chew by his Attorney aforesaid; and the aforesaid Samuel Lloyd Chew by his Attorney aforesaid as before defends the Complaint aforesaid when and where the Court will take the same into Consideration and prays further leave of the Court here to imparle until the Second Tuesday of October next; and to him it is granted: the same day is given to the said Petitioner also:

At which said next Court to wit the

second Tuesday of October, being the eighth day of the same Month, in the year of our Lord seventeen hundred and ninety three, Comes again into the General Court here as well the aforesaid Thomas Carver by his Attorney aforesaid, as the aforesaid Samuel Lloyd Chew by his Attorney aforesaid;- and the aforesaid Samuel Lloyd Chew by his Attorney aforesaid as before defends the Complaint aforesaid when and where the Court will take the same into Consideration and prays further leave of the Court to imparle hereunto until next Court; and he hath it: the same day is given to the petitioner also

At which said next Court to wit the second Tuesday of May being the thirteenth day of the same Month in the year of our Lord one thousand seven hundred and ninety four, Comes again here into the said General Court as well the aforesaid Thomas Carver by his Attorney aforesaid as the aforesaid Samuel Lloyd Chew by his Attorney aforesaid; Thereupon further proceeds of and upon the premises aforesaid between the parties aforesaid by Consent of the said parties, by their Attorneys aforesaid and by order of the Court here thereon for especial reason, and according to the act of assembly in such Case made and provided is continued until the second Tuesday of October next following

And now at this day, to wit: the said second Tuesday of October being the fourteenth day of the same Month in the year of Our Lord one thousand seven hundred and ninety four, Comes again here

into the ~~Gen~~ General Court as well the aforesaid Thomas Carver by his attorney aforesaid, as the aforesaid Samuel Lloyd Chew by his attorney aforesaid, and the aforesaid Samuel Lloyd Chew by his attorney aforesaid as before defendant the complaint aforesaid when and where the Court will take the same into consideration and files in Court here the following Depositions and papers which are by mutual agreement of both parties admitted to be read in evidence in form following, to wit. —

Tom Carver against Samuel Lloyd Chew

The Deposition of Richard Grason aged sixty three years being sworn on the Holy Evangels of Almighty God in this cause saith that he knows neither of the parties. That in the year 1752 he was employed about three months in the family of Mr. Chew Grand Father of the Defendant but does not remember the names of any of the servants about the House, nor did he ever hear, whilst employed as aforesaid, any thing from white or black about any negroes there who were descended from an indian or that were free in that family. That he was born in the neighbourhood of Wye and lived there all his life time and never heard any thing about an indian woman living there or being the descendant of an indian, and he never heard the negroes on Wye Island spoken of but as slaves and he always believed them to be so —

R. Bullen

Ann Maria Chew aged fifty five years being sworn on the Holy Evangels of Almighty God Deposeth and saith

That she this Deponant never heard either from Mrs Dulany Mr. Edward Tilghman, her father or from her late husband Mr Barnet Chew or from any other person that there was an indian Girl brought up in Philemon Lloyds family on Wye Island and this deponant saith that she does not know or ever heard of any negroes living on said Wye Island that were descended from a free indian woman and this deponant saith that in the year sixty two or sixty three she this Deponant intermarried with Mr. Barnet Chew of Annapolis and after marriage she this Deponent and her husband lived with Mr. Dulany of Annapolis two or three months only and this Deponent saith that she this Deponent has understood that Margaret the mulatto woman now claiming her freedom did live in Mr. Dulany's family but who she waited on she this Deponent does not know. And this deponent saith that to her knowledge she has no negroes or ever had any descendants from negro Margaret Mother or Grand Mother and this Deponent saith that some time before her marriage negro Margaret was dismissed from Mr. Dulany's service for misconduct and sent back to Wye Island and this Deponent further saith that she has heard and always understood that the negroes on Wye Island were slaves and further saith not

A. M. Chew

I certify that the above Deposition of Ann Maria Chew was taken before me this 29th day

of July 1793.

Edward Harris

Richard Tilghman Junior made oath before me the Subscriber that to the best of his knowledge he never heard of an indian Girl being brought up on Wye Island in Phil Lloyds family nor did he ever hear that any of the negroes on Said Island were descendants of an Indian and entitled to their Freedom, but always understood that the negroes on Said Island were Slaves –

Sworn before

James Hindman one of the
Associate Justices of Queen Anns
County May 25th 1794.

John Sayer Blake aged 60 years being sworn on the Holy Evangels of Almighty God deposeth and saith that he has heard his Mother mention a Cook Wench on the Island, Commonly Called Chews Island, who went by the name of Indian Moll, but at what time she was there or lived there he does not remember she ever mentioned –

He never heard her say she was an Indian woman born of Indian parents or of an Indian mother. That she never heard of an Indian Girl being left in Philmon Lloyds family, by an indian Woman to be brought up in Said family That he never heard or understood that there were any negroes on the Said Island who were the descendants of an indian Woman That his Mother died in the year Seventeen hundred and Ninety between Eighty three and Eighty four years of age That his Mother Married as he has understood, between Sixteen and

Seventeen years of age and immediately settled at Wye. That his Mother and himself always lived on Wye river opposite to the Said Island. That there was a Negro fellow belonging to his Mother Called indian Will, from his Wheke to an indian, he was born of a Negroe Woman. That he never understood but what the negroes on the Said Island were Slaves that his Mother spoke of the Said Cook Wench and it became a subject of conversation on account of the Said Cook Wench being an excellent Cook and made good entertainments

Jno Sayr Blake

I hereby Certify that the foregoing deposition of Captain John Sayer Blake was taken and Subscribed before me one of the Justices of the Peace for Queen Anns County this 17th day of October 1793.

Atl Emory

Ann Mason aged about eighty one years and upwards being sworn on the Holy Evangels of Almighty God Deposeth and saith That she never heard either from her Mother or any other Person of an indian Girl being brought up in Philmon Lloyds family or of any indian Girl living on Wye Island on which Island the Said Lloyd lived. And she the Deponent saith that she never knew nor ever heard of any Negroes living on Said Wye Island that were descended from a free Indian Woman. That the Deponents Mother died soon after she Came into this County and believes she never was on the Said Isla That this deponent was only once at the House

of Said Philemon Lloyd on Said Wye Island when
she was a Girl. That this deponent does not know
that her Mother ever practised Midwifery & believes she
did not. This deponents Mother died when she this
Deponent was about Seven or eight years of age and
that she this deponent never did practise Mid~~wifery~~
wifery on the Said island or any where else. This
deponent saith that as well as he can recollect her
Mother died about one year after she Came into
this Country and before her death she lived with
Esquire Bennett at Bennetts point Queen Anns
County. That this deponent Came to live at Said
Bennetts point when about Six or Seven years and
that she lived there and at Wye Town just by
until she was upwards of twenty years old. And that
she afterwards moved to a place of the Said Esquire
Bennetts about four Miles from Said Island where
she lived about five years and has all her life~~time~~
Since lived in the Neighbourhood of the Said and that
she always heard and understood that the negroes on
Said Wye Island were Slaves and never heard that
any of them were free. This Deponent saith that
she is now about Eighty one years of age and
saith that about a year ago a Young ~~Wo~~man
Came to her, and about a month after two Women
Came also and made enquiry about free indian
Moll who they Said ~~lived~~ formerly lived on Wye Island
this Deponent told the said Young man and the
two Women that she knew nothing respecting the
free Indian nor ever heard of any free Indian

living on Wye Island. This Deponent saith that
the Said Young man and the two Women appeared to
be mulattoes and understood they Came from the Said
Wye Island but their names and who they belong
to she does not know this Deponent ~~L~~ saith
the aforesaid Mulatto Woman & the young man offered
to pay her Money if she would tell them what she
knew about the free indian Girl on Wye Island.
This Deponent saith she told them she did not
want any of their Money nor did she see any Money
and that she this Deponent did not know nor never
heard any thing about the free Indian Girl on Wye
Island. And this Deponent further saith Mrs
Culany who was the Daughter of the Said Philemon
Lloyd was a girl about twelve or thirteen years
of age when this Deponent Came first to
live at Said Bennetts point and that there was
a Constant intercourse between Esquire Bennetts
family and the Said Philemon Lloyds Family

her
Ann X Mason
mark

I hereby Certify that the above Deposition of
Ann Mason was taken and Subscribed before
me one of the Justices of the peace for Queen
Anns County this eighth day of August fourteen
hundred and Ninety three —

Arch Emory

Mrs Elizabeth Chew being duly examined and
Interrogated by William Pascoe Answereth and
Saith that negroe Margaret the Mother of the

Petitioner came into her family from Wye Island and she always understood was born there, that she came into the family some short time before the birth of her Daughter Mrs Fitzhugh who she thinks is now about 25 or 26 years of age. That Mr Chew her Husband had no negroes from Wye Island during her Marriage with him till after the death of Mrs Dulany his Mother: that after her death he went over to Wye Island and had from thence several negroes among whom to the best of her knowledge was the said Margaret. That the said Margaret brought no children with her but was pregnant at the time. That when she mentioned to her Husband Mr S. Chew what Mrs Hepburne had said about the said Margaret being the descendant of an indian woman, that he answered that if it had been true his Mother must have known of it and would have given some information about it, but that he had never heard her mention any thing about Indian descendants among her negroes and that he did not believe it. That she never heard Mrs Thomas refer to Mrs Hepburne say any thing upon the subject. That she was often at her House as was Mrs Hepburne also and must have seen the said Margaret in her family but that she never had made the like enquires of Mrs Thomas as she did of Mrs Hepburne. That she had understood from Mrs Hepburne that Mr Samuel Chew her Brother and his wife whose maiden name was Miss Lloyd visited her father at the Cove

on Herring bay and that she had seen them there and that the families lived in great harmony in the life time of her brother Samuel that she does not recollect to have heard Mrs Hepburne say that she ever paid a visit to Wye Island Mrs Chew further Answereth and saith that she never saw the said Margaret till she came as aforesaid from the Island into her family, nor did she ever see any person who claimed to be the Mother of the said Margaret & knows nothing of her own knowledge about their descent

Read Considered and Subscribed by me

Eliz^th Chew

Witness

Elizabeth Cloy Chew

Interrogatories to Mrs Elizabeth McClemmon of Annapolis by Mr Pacca

1st When did you first go into Mrs Dulany's family and live with her and how long did you live there

2d Did you know Betty Jackson who lived with Mrs Dulany and do you know how she came into the family and how long did she live in it

3d Were not Betty Jackson and yourself employed to manage Mrs Dulany's family and was it not Mrs Dulany's practise every year to have a list of her negroes put her with their names and ages in order to cut out their Cloathing for them and have it made up in seperate bundles for each young and old

4th Did you know the Mulatto Girl Called Margaret who lived in the family

5th Did you ever hear from Mrs Dulany or the Said Betty Jackson or any other person that the Said Margaret was entitled to her freedom

6th Did you ever hear from Mrs Dulany or the Said Betty Jackson or from any of the family that the Said Margaret was descended from an Indian Woman on Wye Island or elsewhere

7. Did you ever hear from Margaret herself or from any of Mrs Dulanys Negroes that the said Margaret was descended from an Indian Woman

8th Did you ever hear from any person whatever that an Indian Girl was brought up in Philemon Lloyds family on Wye Island –

The Deposition of Mrs Elizabeth McClemon of the City of Annapolis in the State of Maryland aged about seventy years taken before Allen Quynn Esquire one of the justice of the peace for Anne Arundel County in Said State at the House of John Wilmot in the Said City on the twenty first day of September Fourteen hundred and ninety four being first duly sworn to the aforegoing Interrogatories answereth as follows –

To the first Interrogatory saith that she went to live in the family of Mrs Henrietta Maria Dulany about the year Fourteen hundred and Sixty and continued there about three years –

To the Second Interrogatory saith that she knew Betty Jackman who lived in Mrs Dulanys family

at that time, and that she believes the Said Betty Jackman had then lived there about thirty years

To the third Interrogatory saith that Betty Jackman and this Deponent were employed in the Management of Mrs Dulanys family that she remembers it was the practice of Mrs Dulany every year to have a list of her Negroes Names and ages sent to her in order to Act and their Cloathing for them, and that said Cloathing was made up in Seperate bundles for each Negro Young and Old –

To the fourth Interrogatory saith that she knew the Mulatto Girl named Margaret

To the fifth Interrogatory saith that she never heard Mrs Dulany, Betty Jackman or any other person say that the Said Margaret was entitled to her freedom

To the sixth Interrogatory saith that she never heard from Mrs Dulany or Betty Jackman or from any of the family that the Said Margaret was descended from an indian Woman on Wye Island or elsewhere –

To the fourth Interrogatory saith that she never heard from Margaret her self or from Mrs Dulanys Negroes or from any other person that the Said Margaret was descended from an indian Woman

To the eighth Interrogatory saith that she never heard from any person whatever that an indian

Girl was brought up in Philmon family on Wye Island

Sworn to before Allen Quynn

Edward Coursey aged about thirty nine years being sworn on the Holy Evangels of almighty God deposeth and saith.

That he this Deponent to the best of his knowledge never heard at any time of indian descendants from a free indian Woman being brought up in the family of Philmon Lloyd on Wye Island or of any indians living at any time on the S. Island: And that he this Deponent has always conceived that the negroes living on Wye Island were negro Slaves.

E. Coursey

I do certify that the above Deposition was taken before me this 17th day of August 1793.

Edward Harris

Mrs Wederstrandes aged about fifty two years of age being sworn on the Holy Evangels deposeth and saith -

That she has heard but cannot say from what person that there was a Woman on the Island who went by the name of Indian Moll but she never heard to the best of her knowledge that she was an indian Woman born of Indian parents or an indian Mother. That she does not recollect to have heard at what time the Said Moll lived on the Island nor how she Come to be Called Indian Moll

that she never heard of there being three negroes on the Island descendants of an Indian until the late reports in Consequence of a petition for freedom.

Mary Wederstrandes

I hereby certify that the foregoing deposition of Mrs Mary Wederstrandt was taken and subscribed before me one of the justices of the peace for Queen Anne's County this 17th day of October 1793.

Art Emory

Petition for Freedom

Negro J. Chew } Interrogatories to Daniel Dulany Esquire. First Did you ever hear that an indian Girl was brought up in Philmon Lloyd's family on the Island in Wye river Called Chew Island or Wye Island on which the Said Philemon Lloyd lived. Second Did you ever hear or understand that any of the negroes on the Said Island either in the life time of Philmon Lloyd or Samuel Chew Said his Wife or Daniel Dulany and his wife Henrietta Maria (who was the widow of the Said Samuel Chew) or in the life time of the Said Henrietta Maria Dulany who survived the Said Daniel Dulany were descendants of an indian Woman

The Answer of Daniel Dulany Esquire to the foregoing Interrogatories - To the first Interrogatory he saith that to the best of his recollection he never did hear of any indian Girl being

brought up on the Said Island

To the second Interrogatory he saith to the best of his recollection he never did hear or understand that any Negroes on any of the Said families, or on the Said Island were descendants of an indian Woman -

Sworn and Subscribed before me this 25th September 1793

Daniel Dulany

Geo: Salmon

Dear Sir,

Some of the Island negroes who fell to the lot of Mr. A. Chew on the Western Shore after Mr Dulany's death have petitioned there for freedom alledging that they are the descendants of an Indian Girl brought up in the family of old Shebmon Lloyd, while he lived on the Island as you were one of the appraisers of the Estate after Mr Dulany's death and I believe too on the death of Old Dan.l Dulany and as you have lived many years on Wye river you must be able to give good information of such Claim to freedom if any justly existed. I will therefore thank you to take the first opportunity of giving your Deposition on the following Interrogatories -

1.st Did you ever hear of such an indian girl brought up in S.d Lloyds family -

2.d Did you ever hear of any Negroes on the Island being Descendants from such indian Girl -

3.d Were you not an appraiser S.d Dulanys

Estate and Mr Dulany's estate on the Island

4.th How long have you lived on Wye river and in the Neighbourhood

5.th Have you not had a general intercourse with the Owners of the Island and the old Neighbours about it

6.th Have you not always understood that the negroes on the Island were negroes slaves -

I will thank you to state your answers to the foregoing Interrogatories and make a Deposition before some Magistrate as soon as possible enclose it if you please for me and leave it at Balt Lloyds & I will send for it -

I am Dear Sir

Yr obt. Serv.

Wm Paca

It is agreed by Counsel Depositions shall be taken this way subject to any further Interrogatories either may send afterwards

John Bracco Esq. 21st July 1793.

Talbot County S.t

The Deposition of John Bracco of Talbot County aged seventy four years, who having been solemnly sworn on the Holy Evangels to tell the truth answers make to the foregoing Interrogatories and thereon to declare the truth the whole truth and nothing but the truth Deposeth and Saith as follows viz.

In Answer to the first Interrogatory. That he never to his knowledge heard of any

Indian girl brought up in Phil Lloyds family from any person whatever.

To the second Interrogatory the Deponent answers that he never did to his knowledge or remembrance hear that any of the negroes on what was then called Chews or Dulanys Island and now belonging to Mr. Pacca and Mr. Bordley were descendants of such Indian Girl, or any other indian whatever

To the third Interrogatory The Deponent answers that he was an appriser of both Mr. Dulanys and Mr. Dulanys Estates on the said Island joined in the first with a Mr. John Claxland of Queen Anns County deceased and in the second with Mr. Jno. Nicholls of Talbot County also deceased

That Mr. Walter Dulany deceased attended the first appraisement and that he also attend the second with Mr. Samuel and Philemon Chew

To the fourth Interrogatory the Deponent answers that he hath lived on Wye river and in the neighbourhood fifty three years last May

To the fifth Interrogatory the Deponent answers that from the year 1740 he hath had a General intercourse with all the owners of the Island especially with the Dulany family and also with the old neighbours about it.

To the sixth Interrogatory the Deponent answers that the negroes on the said Island were slaves and the descendants of slaves as he understood nor did he ever to his knowledge and remembrance hear any report to the

Contrary

John Bracco

The above Deposition made and sworn to before me the Subscriber one of the Justices of the peace for Talbot County this 26th day of July 1793.

W Dawson

John Plummer aged sixty nine years being sworn on the Holy Evangelists of almighty God deposeth and saith that he was an Overseer on Wye Island in the year Seventeen hundred and fifty six and lived there as an Overseer seven or eight years that he never heard or understood that an indian Girl was brought up in Philemon Lloyds family or that any indian Girl or woman lived upon the Island and this Deponent further saith that he never heard or understood that there were any negroes on the said Island who were descended from an indian woman but that he always heard and understood that the negroes on Wye Island of every sort were negroe slaves. And this Deponent further saith that he knew a man who lived on the Island called Indian Jemmy but that he was always spoken of and considered as a negro slave and that he never heard any thing to the contrary and this Deponent saith that Basil Warfield was the manager of the Island and the principal overseer when this Deponent came on the

Island and that he lived there for many years before this Deponent Came to live on Wye Island and this Deponent saith that he Knew James Griffin who was one of the under Overseers to Warfield on said Island and who had lived there many years previous to this Deponents Coming on said Island and this Deponent further saith that he knew John Clayland who was under overseer at the same time with Griffin on said Island both being under Warfield. This Deponent Saith that he knew Thomas Land who had been Manager for many years on Wye Island before Said Warfield and that he lived five years with Said Land after Said Land had left Wye Island and frequently had Conversation with him about the negroes on Wye Island before and ~~after~~ at the time this Deponent lived on Wye Island.

This Deponent saith that he was born within a few miles of Wye Island and always lived in the neighbourhood of said Island and he further saith that he knew negroe Carpenter Jimmy who was also Skipper and Called Captain Jimmy frequently and he knew his wife Rachel

Sworn to before me the Subscriber one of the Justices of the peace for Talbot County this 7th day of August 1793.

John Roberts

The Deposition of Lewis Scrivener aged about 50 years the Said Scrivener being duly Sworn deposeth as follows; That at the age of fourteen he went to live in the family of the late Colo Samuel Chew as overseer and that he continued to live with the Said Chew until within the last four years past when he became a tenant to his Lord Samuel Chew and lived on the Land where he was formerly overseer, That ever Since he lived in the family of the Said Colo Chew he knew a Woman Called Margaret who was one of Mr. Chew's House Servants and her Son Tom Sampson (the same person who has now petitioned for freedom and who now Calls himself Tom Caverly or Some Such name) that during the time he lived in the aforesaid Chew's family he always understood that the aforesaid Margaret was a Slave and that he never heard her Claim her freedom or say any thing about it nor never heard any other person say that she had a right to it until within this three years past. And the Said Scrivener further says that he knew two negro Women that belonged to the aforesaid Colo Samuel Chew, one Called black Lucy, and the other called indian Lucy that Indian Lucy had a Husband Called Will Creek who was free and said to be an Indian

October 16th 1794 Sworn before

Lewis his mark Scrivener

Saml Harrison Jun.

William Paca being sworn on the Holy Evangels of Almighty God deposeth and saith that he married in Mrs Dulany's family in the year Seventeen hundred and fifty three and that he was intimately acquainted with Mrs Dulany and all her Children that he was well acquainted with the principal characters in the Neighbourhood of Wye Island particularly with old Mrs Blake and her Son John Blake and her daughter Mrs Wedderstanot also with Edward Tilghman, Hensley, Robert Lloyd, William Tilghman and old Colo. Lloyd M. Brown and old Adam Gray Bracco and also with the Chews on Herring bay: he further saith that as adm. with the will annexed of Mrs Dulany and as Ex. of P. Lloyd Chew he had possession of all the papers and documents that related to Old Phil. Lloyds Estate. And the said William Paca deposeth and saith that he never heard from any person whatever till lately of an indian Girl being brought up on Wye Island or that there ever were on the said Island any negroes descendants of an indian Woman; nor did he ever observe in any of the papers or documents aforesaid the least intimation of it. And he further deposeth & saith that the first intimation he ever had of such indian woman or descendants was after the petition for freedom was filed and that intimation was given him in Annapolis by some person who had heard of the petition. Sworn to the 30th May 1794 -

Before J. Jos Chase

Queries by William Paca to Mr John Thomas

Did you ever hear from Mrs Thomas, your mother, or any of your Ancestors that Margaret the mother of the negroe who has petitioned for his freedom belonging to Mr Chew, was a descendant from an Indian woman? Did you ever hear of an Indian Girl being brought up in Phil. Lloyds family on Wye Island, or, that there were any descendants on that island of Indian woman? Was not Mrs Thomas intimate at the late Mrs S. Chews, and often visited there?

When did Mrs Thomas die, of what age was she?

Whether she or Mrs Hepburn was the eldest sister?

I never did hear from my Mother, or any of my Ancestors that Margaret was a descendant of an Indian Woman; and I never did hear any thing of an Indian Girl being brought up in P. Lloyd's family. My mother the late Anne Thomas was intimately acquainted with the late Samuel Chew of Herring bay, and has visited him there. He frequently visited her at West river. Anne Thomas died in May 1777 aged seventy. She was elder than her sister the late Mary Hepburn.

Given under my hand, this 16th September 1794 -

Tom Carver agst Samuel Lloyd Chew — Petition for freedom in the General Court

Elizabeth Chew the widow of Samuel Chew late of Queen Anns County and State of Maryland aged sixty years being duly sworn on the Holy Evangels of Almighty God, deposeth and saith that having heard Margaret, the Mother of Tom the petitioner when displeased with some one of the family, say that she the said Margaret would not be put upon by no body, for that she the said Margaret was a free woman, free as any body, if she had her rights, this deponent was induced by the above circumstance upwards, of twenty years ago to make enquiry of Mrs Mary Hepburne of Upper Marlborough in Prince Georges County and State of Maryland, which Mary Hepburn was the Sister of Samuel Chew of Herring bay in Anne Arundel County and then province of Maryland which Samuel Chew intermarried with Henrietta Maria Lloyd, the only child of Philemon Lloyd of Queen Anns County and province aforesaid

whether the said Margaret had any just pretensions to her free
dom and repeated to said Mary Hepburn what Margaret had
said as above stated, said Mary Hepburn answered, that is true
Margaret certainly is a free woman and no slave; because
said Margarets Mother was the Daughter of an Indian
woman a native of this country who was brought up and liv'd
in the family of the said Philemon Lloyd of Queen Anns county
Being asked when the above conversation happened,
the Deponent answers at Herring bay in Anne Arundel
County at the dwelling house of the deponents
husband which dwelling house was some time after wards
burnt down. And this deponent further saith that
she recollects that Mrs. Hepburn did say that
the Grand Mother of Margaret was a native
of this country from the following circumstances
when Mrs. Hepburne mentioned that Margarets
Mother was the daughter of Indian Woman,
the Deponent knowing that her husband
possessed Slaves, who were said to be the descendants
of an East India Indian, asked where the said
Indian (the Mother of Margarets Mother)
Came from and she answered she was
a native of the country and was brought
up in the family of Philemon Lloyd aforesaid

Eliz.th Chew

Sworn before the Subscriber one of the justices
of Queen Ann's County this fourth day of
May 1793.

Perene Fitzhugh

Tom Carver
against
Sam.l Lloyd Chew

Petition for Freedom
Petitioners Interrogatories

1.st Do you know the parties in this suit and how long have you known them
2.d Do you know Margaret the Mother of the petitioner and how long have you known her
3.d Did you know Rachel the Grand mother of the petitioner and is she dead or living
4.th Do you know or have you been informed and by whom that the petitioner or his Mother or Grand Mother was descended from a native free Indian woman relate your knowledge fully
5.th Do you know any other matter or thing relating to the petitioners right to freedom if you do relate it

15.th September 1794

G. Duvall

Joseph Mumford aged about 74 being sworn on the Holy Evangels of almighty God deposeth and saith.

That as to the first Interrogatory he has known the petitioner Tom Carver for about five or six years

That as to the second Interrogatory he saith

he knows nothing of Margaret the mother of the Said Thomas Carver except that there was one of that name that lived in Mr. Chew's family –

That as to the 3d Interrogatory he knows nothing of Rachel the Grand Mother of the petitioner nor whether she be dead or living.

That as to the 4th Interrogatory he never heard or understood that the said petitioner or Mother or Grand Mother or any of his Ancestors were ever descended from an Indian Woman –

Being interrogated on the part of Samuel Chew the other party to the suit he deposeth and saith, that he knew Samuel Chew the Great Grand father and Samuel Chew his Grand father, that he has lived all his life time within the Neighbourhood of the said Chews except about five years when he lived in Virginia

That he never heard or understood of an indian Woman living in the Chew family or Lloyd family or that they had any persons or Mulattoes in their families descended from an Indian Woman but that he has always understood that negroe Tom the petitioner and all the negroes held by the said great Grand father and Grand father of the Defendant Samuel Chew were negroe Slaves and descended from Slaves –

Joseph Mumford

September 16th 1794 Sworn before me

Samel Harrison Jun.

Tom Carver against Samel Lloyd Chew

Petition for freedom in the General Court

Elor. Chew the widow of Samuel Chew late of Queen Anns County and State of Maryland aged sixty being duly sworn on the Holy Evangels of Almighty God deposeth and saith that having heard Margaret the mother of Tom the petitioner when displeased with some one of the family say that she the said Margaret would not be put upon by no body for that she the said Margaret was a free woman as free as any body if she had her right this deponent was induced by the above circumstances upwards of 20 years age to make enquiry of Mrs Mary Hepburn of Upper Marborough in Prince Georges County and State of Maryland which Mary Hepburne was the sister of Samuel Chew of Herring bay in Anne Arundel County which Samuel Chew intermarried with H. M. Lloyd the only child of Phil Lloyd of Queen Anns County and Province aforesaid whether the said Margaret had any just pretensions to her freedom and repeated to said Mary Hepburn what Margaret had said as above stated; said M. Hepburn, that is true: Margaret certainly is a free woman and no slave because said Margarets mother was the daughter of an Indian woman a native of this Country who was brought up and lived in the Family of said P. Lloyd of Queen Anns County. Being asked where the above conversation happened; the Deponent answers at Herring bay in Anne Arundel County at the dwelling house of the deponents husband, which dwelling house was some time afterwards burnt down. And this deponent further saith that she recollects that Mrs Hepburn did say that the grand Mother of Margaret was a native of this Country from the following circumstances: – when Mrs Hepburn mentioned that Margarets mother

was the daughter of an Indian woman the Deponent knowing that her husband possessed slaves who were said to be descendants of an East India Indian asked her the said Mary Hopburne where the said Indian (the Mother of Margaret) came from, and she answered she was a native of the Country and brought up in the family of Phil. Lloyd aforesaid

+

El. Chew.

Sworn before the subscriber one of the Justices of Queen Ann's County 4th May 1793.

Per. Fitzhugh

Interrogatories to Mrs S. Hopburn and Mrs Secke his sister

1st Did you know negro Margaret who lived at Mr Samuel Chews on Herring Bay?

2nd Did you ever hear from your Mother or from any of your Ancestors that the said Margaret was a descendant from an Indian Woman and entitled to her freedom?

3rd Did you ever hear from ~~your~~ Mother, or any of your Ancestors that there was an Indian Girl brought up in Philemon Lloyd's family on Wye Island or Chews Island in Wye river Queen Ann's County?

4th When did Mrs Hopburn die, and what was her age when she died. And was she not Younger than her sister Mrs Thomas? ~~Samuel Hopburn of Prince Georges~~

~~Samuel Hopburn of Prince~~ Georges County aged about 51 years being first sworn on the Holy Evangels of Almighty God that he would true answers make to the annexed Interrogatories answereth and saith.

1st Interrogatory. Yes, he knew a Mulatto woman named Margaret some years ago in Mr Chews Family.

2nd No he never did.

3rd No he never died.

4th Mrs Hopburn died some time in August 1770 aged 56 years and was about seven years younger than her Sister Mrs Thomas. Sworn before me this 25th September 1794

John Smith Brookes

Ann Secke of Prince Georges County aged 48 years having having first solemnly affirmed that she would true answers make to the annexed Interrogatories answereth and saith.

1st Interrogatory. Yes she knew a Mulatto woman named Margaret that she understood came from Mrs Dulanys.

2nd No she never died.

3rd She cannot recollect any particular of that kind.

4th Mrs Hopburn died the 10th August 1770 aged near 56 years ~~and~~ was about seven years Younger than her sister Mrs Thomas.

Affirmed before me this 25th day of September 1794

John Smith Brookes

The Deposition of Thomas Lane of Talbot County taken before me William Stewart Gent one of his Lordships Justices of the Peace and for Anne Arundel County. The Deponent being sworn on the Holy Evangels of Almighty God deposeth and saith that he this deponent was chief overseer Trustee and Manager of the Island Estate and plantations thereon of Mr Samuel Chew deceased on his Island in Wye River commonly called Chews Island as well for some years before and until the death of the said Mr Chew as from his death under the Widow and Executrix of the said Mr Chew, and under Mr Dulany her last husband. That he this deponent was present at the appraisement of the said Estate on the said Island soon after which said Appraisement Daniel Dulany Esqr now deceased intermarried with the said Widow and Executrix of the said Mr Chew. And that he this

Deponent after the said intermarriage acquainted the said W. Dulany that there were omitted to be appraised and Inventoried of the goods of the said Mr. Chew on the said Island a great quantity of Indian Corn and a parcel of raw hides Tallow, Fatt, bacon, Wheat, and other things wherewith the said W. Dulany upon a more particular discourse with this Deponent about them appeared to be well satisfied and made answer that the said goods so omitted as aforesaid should be appraised and accounted for in an additional Inventory. That this deponent doth not certainly know the exact quantities of the said articles omitted, but verily believes upon good grounds that the Indian corn was at least a thousand barrels of the value (as corn then commonly sold) of ten shillings per barrel. That the Hides were thirty of the value of eight shillings per hide That in the month preceding the death of the said W. Chew there were killed and cured of the goods of him the said Mr. Chew on the said Island 120 fattened Hoggs many of them of great weight and he verily believes that on an average the said 120 Hogs must each of them have weighed 150 pounds weight. That the meat and fatt of the said Hogs and of thirty beeves were at the time of the said appraisement unspended or disposed of (which is the best account that at this time he can give thereof) except that a few barrels of the smaller pork were shipped as sea provision for a snow belonging to Mr. Chew. This Deponent further saith that there was at the time of the said appraisement a negro youth of the said Mr. Chews Estate aged about 18 years a very valuable fellow which he believes was not appraised and also a chaise of four wheels very old and of no great value, but the value thereof he knows not which chaise was also not appraised, but sold by the said Mr. Dulany to one Lowe for a price unknown to this deponent. This deponent further saith that he verily believes the above mentioned articles of Corn, Pork, Beef, Fatt, Hides, or any of them are not included in the said Inventory, excepting 130 pounds of bacon, part of the said cured Hogg meat which is mentioned in the said Inventory as this deponent is informed and believes.

Thomas Lane

The above deposition taken before me this 21st day of September 1761

Wm Stewart

Thereupon the Depositions and papers filed in this case being admitted by the Counsel on each side to be read in evidence on the hearing of the said petition and the Defendants Counsel offering himself ready for trial. On motion of the Counsel for the petitioner that the said petition be dismissed, It is therefore Ordered and adjudged by the Court here that the said petition be dismissed.

Test

John Givins Clk.

Maryland Sct. I hereby certify that the foregoing is truly taken from Liber I.G. No 25 folios 73 &c to 94 one of the Judgment Records of the late General Court for the Western Shore of Maryland, deposited and lodged in, and belonging to the office of the Court of appeals for the said Shore.

Seal of the Court of Appeals of the Western Shore

In Testimony whereof I hereunto subscribe my name and affix the seal of the said Court of Appeals this first day of May in the year of our Lord one thousand eight hundred and ten

Tho: Harris Jun. Clk. Ct. Appl. W.S.

The Counsel for the Defendant then objected to the said Deposition as being inadmissible, but the Court permitted the same to be read in evidence, to which the Defendant excepted and prayed the Court to sign and seal this his Bill of Exceptions which is accordingly done this 12th May 1812

Tho. Worrell (Seal)

Robert Moody
vs
Richard Jones

In addition to the matters before stated the pltff proved by Competent Testimony that he was the son of a certain negro Betty and that Betty was the Daughter of a certain yellow woman called Rachel who heretofore obtained a Verdict for her freedom in Queen Anns County Court as will appear by the following Record

Maryland, Queen Anns County to wit:

At a County Court held for Queen Anns County at Centreville in said County on the fourth Monday of October in the year Eighteen hundred and two By the Commissioners and Officers appointed and Empowered to hold the same Court of whom were

Present

The Honble James Tilghman Esq Chief Justice
Jonathan Breadey
Henry Darden } Esqrs Assos: Judges
James R. Kent Esq. Shff. Saml. T. Wright

In the Record and proceedings of the same Court is contained the following to wit:

Rachel Baker & others
vs
John Pace

Be it remembered that heretofore to wit: at October Term Eighteen hundred

Rachel Baker James Isaac and Esther Betty John Isaac Tom, Phoebe Benjamin Caty Henry Baker and Nancy Sarah Charles Henny Harry Abby & Harry by William Carmichael & Richard T. Earle their attorney prefered a petition of freedom to Queen Anns County Court here against John Paca in manner and form following to wit:

To the Honourable the Chief Justice of Queen Anns County Court and his associates

The petition of Rachel Baker James Isaac and Esther her Children and Betty John Isaac Tom children to the said Esther and Phoebe child to the said Esther and Benjamin and Caty children to the said Phebe and Henny Baker and Nancy child to the said Henny and Sarah children to the said Nancy and Charles Child to the said Henny Baker and Henny child to the said Henny Baker and Harry her child and Abby and Harry children to the said Henny Baker Humbly Sheweth that they are descended from an Indian woman named Molle or Mary that the said Molle or Mary was a free native of America who lived and died on Wye River on the Eastern Shore of Maryland - your petitioners have been entitled to their freedom from their birth and are now deprived thereof and held as slaves by John Paca of Queen Anns County - Petitioners therefore pray process against the said John Paca to answer the premises

here alledged and be otherwise redressed as to your Honours may seem right and they as in duty bound will pray &c

William Carmichael and
Richard T. Earle for Petitioners

Whereupon it is ordered by the Court here that a Summons issue to Cause John Paca of Queen Anns County to appear immediately in the said Court to answer to the petition of the said Rachel Baker and others which accordingly issues as follows to wit:

Queen Anns County to wit. The State of Maryland

Seal of Queen Anns County Co.

To the Sheriff of Queen Anns County, Greeting: You are hereby commanded to summon John Paca late of Queen Anns County that cause excuses and delays set aside he be and appear before the County Court here now sitting in Centre ville to answer the petition of Rachel Baker and others prefered against him for freedom. Hereof he is not to fail, and fail not at your peril, and have you then and there this writ. Witness James Tilghman Esquire Chief Judge of our said Court the 26th October 1800.

Issued the 27th October 1800. Saml. Wright Clk
(C.C.)

Whereupon the said Sheriff of Queen Anns County to whom the said aforegoing summon was in form aforesaid directed makes return thereof to the Court here the said Summons thus endorsed to wit "Summoned.

Henry Coston Sheriff.

And the said John Paca being called appears in Court here in proper person. Thereupon on motion of the said Rachael Baker and others by their attornies aforesaid, it is ruled by the Court here that the said John Paca enter into a Recognizance to the State of Maryland in the sum of one thousand pounds Current money which is accordingly done, and is contained in the following words viz:

You John P. Paca do acknowledge yourself to owe and stand indebted to the State of Maryland in the sum of one thousand pounds Current money to be levied of your bodies goods and chattels Lands and Tenements for the use of the said State to be void upon Condition that you will permit negroes Rachel Baker and others who have prefered a petition against you for their freedom and which is now depending in Queen Anns County Court to have reasonable access to their Counsel and that you will not directly or indirectly remove or suffer or cause the said negroes or either of them to be removed without the Jurisdiction of this Court until their said petition shall have been determined —

Test Jno: T. Wright

Thereupon further process of and upon the premises aforesaid by and between the ~~said~~ parties aforesaid, by Consent of the said parties and their attornies and by order of the Court here thereon this Cause is Continued until the first Monday of May next: At which said first Monday of May in the year Eighteen hundred and one Comes into Court here, the said Rachel Baker & others

by their attornies aforesaid, and the said John Paca in proper person — Thereupon on motion of the said John Paca it is Ordered by the Court here that this Cause be Continued until the fourth Monday of October next: At which said fourth Monday of October Eighteen hundred and one Comes again into the County Court here as well the said John Paca in proper person as the said Rachel Baker and others by their attornies aforesaid — Thereupon further process of and upon the premises by and between the parties aforesaid by Consent of the said parties and their attornies and by order of the Court thereon is further Continued until the first Monday of May next. At which said first Monday of May in the year Eighteen hundred and two, Comes again into Court here the said John Paca by John Scott his attorney and the said Rachel Baker & others by their attornies aforesaid — Thereupon further process of and upon the premises aforesaid by and between the parties aforesaid, by Consent of the said parties and their attornies and by order of the Court thereon is further Continued until the fourth Monday of October next: And now here at this day to wit: the said fourth Monday of October in the year Eighteen hundred and two, Comes into Court here as well the said John Paca by his attorney aforesaid as the said Rachel Baker ~~& others~~ by their attornies aforesaid And the said John Paca by John Scott his attorney aforesaid ~~said~~ that the said Moll was not an Indian woman as the said Rachel Baker James Sooar & Esther, Betty

John Sacar Tom Phebe Benny Nancy Sarah Charles
Benny Barry Abby & Harry by their said petition above have
alledged and of this he puts himself upon the Country & the
said petitioner in like manner. and the said John Paca
by his said attorney further saith that the said Rachel
Baker Somes Sacar Esther Betty John Sacar Tom Phebe
Benny Nancy Sarah Charles Benny Barry Abby & Harry
are not nor is either of them lineally descended in the female
line from a free native Indian woman of America named
Moll as they by their said petition above have alledged and
of this the said John puts himself upon the Country and
the said petitioners in like manner and so forth. —
Therefore let a Jury thereon appear before the Court here
immediately by whom &c. who neither &c. to recognize &c. forth.
because as well &c. who being called comes; that is to say,
John Dukhamel Joseph Bedford John Dodd Jun. James
Peters Philemon Spencer Joseph Wright Thomas Watson
William Jacobs Samuel Rochester George Gordon
William Phillips & Tristram Thomas who being impannelled
and sworn to say the truth in the premises, on their oaths
do say. as to the first issue between the parties aforesaid joined
that the said Indian woman named Moll or Mary
was a native of America and free by birth, as the said
Rachel Baker & others the petitioners aforesaid, by their said
petition have alledged; and as to the second issue between
the parties aforesaid without joined, the jurors aforesaid, on their
Oath aforesaid, further say, that the said Rachel Baker
& others the petitioners aforesaid are lineally descended in the

female line, from a free ~~Indian~~ ~~woman~~ a native of
America named Moll or Mary in manner and form
as the said Rachel Baker & others the petitioners aforesaid
have by their said petition alledged: And the said
John Paca by his attorney aforesaid saith that the
Court here ought not to proceed to give judgment in
that behalf and upon the said Verdict and pray judgment against
him in and upon the said Verdict by the jurors aforesaid
in form aforesaid given may be set a side and a new trial
granted for the follow reasons. 1st Because that the
Verdict is without Evidence — 2d Because that the
Verdict is Contrary to the Evidence given in the Cause.
3d Because that the Jury left their Room and did
seperate without having agreed upon their verdict —
4th Because that the Jury did eat and drink before they
had agreed upon their Verdict without the Consent of
the Court — Whereupon all and singular the premises
aforesaid being by the Court here seen heard and fully mature
stood, and mature deliberation thereon had, for that it
seems to the Court here, that the said Verdict for the reasons
aforesaid set forth out not to be set a side — Therefore it
is considered by the Court here, that the said Rachel
Baker and others the petitioners aforesaid recover their
freedom of and against the said John Paca and
that they be free and discharged from the service
of the said John Paca and that they the said Rachel

Baker and others go thereof free and discharged without day and so forth. It is also considered by the Court here that the said Rachel Baker & others recover against the said John Pace the sum of thirty nine Dollars and forty eight and one third Cents by the Court here into the said Rachel Baker and others adjudged on their expent for their Costs and charges by him about the prosecution of his petition aforesaid laid out and expended, and that they have therof their execution, and so forth. —

Maryland, Queen Ann's County to wit

I hereby certify that the aforegoing is truly and exactly taken and Copied from the Records of Queen Ann's County Court.

Seal of Queen Ann's County Court

In Testimony whereof I have hereto set my hand and affixed the Seal of my Office this first day of May Anno Domini Eighteen hundred and twelve

John Browne
Clk
Queen Ann's County Court

The petitioner also Identified the said Rachel as the person who obtained the verdict and then offered the same as Evidence of the pedigree of the said Rachel to which the Defendant Objected and the Court admitted the said Verdict in Evidence whereupon the Defendant excepted and prayed the Court to sign and seal this his Exception which is accordingly done this 12th May 1812.

Jno. Morrell (Seal)

Robert Moody
Rich.d J. Jones } In addition to the several Matters before stated the Petitioner offered in evidence the following Copy of a Record to wit. State of Maryland. Baltimore County set. At a Court of Oyer and Terminer and Gaol Delivery for Baltimore County, held at the Court House in the City of Baltimore in and for the County aforesaid, the first Monday in March in the Year of our Lord One thousand eight hundred, for the Trial of all Felonies, and other Crimes, Offences and Misdemeanors committed in the said County — Present

Walter Dorsey Esquire Chief Justice
George G. Presbury } Esquires Associate Justices
Job Smith

Cornelius H. Gist Esquire Sheriff
William Gibson Clerk

Among other proceedings of the same Court is the following to wit

Negro Margaret Creek
against
William Wilkins } Be it remembered, that on the third Tuesday in November in the Year of our Lord One thousand seven hundred and Ninety seven, Negro Margaret Creek by Thomas Hill her Attorney exhibited to the Court here sitting her Petition for Freedom against William Wilkins in form following to wit — To the Worshipful the Justices of Baltimore County Court of Oyer & Terminer &c. The Petition of Margaret Creek humbly sheweth that your Petitioner is the daughter of Rachel who was the daughter of an Indian Woman named Chloe or Mary, that the said Mary was a Free Native of America who lived and died in Boyd, that your Petitioner has been entitled to Freedom from her birth, that she is now deprived thereof & held as a Slave by William Wilkins of the Town of Baltimore, Your Petitioner therefore prays process against the said Wilkins to answer the premises & she otherwise redressed as may seem right —

Thos. Hill Solicitor for Petitioner

Whereupon, It is ordered by the Court here that Subpena issue to the Sheriff of Baltimore County against the said William Wilkins to answer to the Petition aforesaid of the said Margaret Creek which issued accordingly in form following to wit — Baltimore County Sc. — To the Sheriff of Baltimore County Greeting, You are hereby commanded to summon William Wilkins, that all excuses set aside he be and appear before the Court here of Oyer and Terminer and Gaol Delivery, immediately, to answer to the Petition of Margaret Creek preferred against him the said William Wilkins for Freedom. Hereof fail not at your peril and have you then and there this Writ Witness Henry Ridgely Esquire Chief Justice of the said Court the Day of November in the year of our Lord One thousand Seven hundred Ninety Seven. Issued the Day of November 1797. Wm Gibson Clk

And the Sheriff of Baltimore County to whom the said Summons was inform aforesaid directed, makes return thereof to the Court here, that he hath summoned the said William Wilkins as he was commanded. And the said William Wilkins by Nicholas Brice his attorney appears in Court here, and defends the Complaint aforesaid when and where the Court will take the same into consideration, and prays leave of the Court here to imparle until the second Tuesday in January next, and to him it is granted, the same day is given to the said Margaret Creek also. At which said second Tuesday in January in the year of our Lord One thousand Seven hundred and Ninety eight comes again into the Court, as well the said Margaret Creek by her Attorney aforesaid, as the said William Wilkins by his Attorney aforesaid. And the said William Wilkins by his Attorney aforesaid, as before defends the complaint aforesaid when and where the Court will take the same into consideration, and prays leave of the Court here to imparle until the second Monday in March next, and to him it is granted, the same day is given to the Said Margaret Creek also. At which said second Monday in March in the year of our Lord One thousand Seven hundred and Ninety eight comes again into the Court here, as well the Said Margaret Creek by her Attorney aforesaid, as the said William Wilkins by his Attorney aforesaid: And the said William Wilkins by his Attorney aforesaid as before defends the complaint aforesaid when and where the Court will take the same into

same into consideration, and prays leave of the Court here to imparle until the second Monday in August next and to him it is granted, the same day is given to the Said Margaret also. At which said second Monday in August in the year of our Lord One thousand Seven hundred and Ninety eight, comes again into the Court here, as well the Said Margaret Creek by her Attorney aforesaid, as the Said William Wilkins by his Attorney aforesaid: And the said William Wilkins by his Attorney aforesaid, as before defends the complaint aforesaid when and where the Court will take the same into consideration, and prays leave of the Court here further to imparle until the third Monday in November next, and to him it is granted, the same day is given to the Said Margaret Creek also. At which said third Monday in November in the year of our Lord One thousand Seven hundred and Ninety eight comes again into the Court here as well the Said Margaret Creek by her Attorney aforesaid as the said William Wilkins by his Attorney aforesaid: And the said William Wilkins by his Attorney aforesaid as before defends the complaint aforesaid when and where the Court will take the same into consideration and prays leave of the Court here further to imparle until the second Monday in January next and to him it is granted, the same day is given to the said Margaret Creek also. — At which said second Monday in January in the year of our Lord One thousand Seven hundred and ninety nine, comes again into the Court here as well the Said Margaret Creek by her Attorney aforesaid, as the said William Wilkins by his Attorney aforesaid: And the said William Wilkins by his Attorney aforesaid as before defends the complaint aforesaid when and where the Court will take the same into consideration, & prays leave of the Court here further to imparle until the first Monday in March next, and to him it is ~~given~~ granted, the same day is given to the Said Margaret Creek also. — At which said first Monday in March in the year of our Lord One thousand Seven hundred and ninety nine, comes again into the Court here, as well the said Margaret Creek by her Attorney aforesaid, as the said William Wilkins by his Attorney aforesaid: And the said William Wilkins by his Attorney aforesaid as before defends the complaint aforesaid

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his Attorney aforesaid. And the said William Wilkins by
is Attorney aforesaid, as before defends the complaint aforesaid
d saith that the said Margaret Creek ought not to
ve or maintain her Petition against him, because he
aith that the said Margaret Creek in the day of preferring
Petition in this cause was a Slave, and of this he is
ady to verify: Whereupon he prays Judgment if the said
Margaret Creek ought to have or maintain her Petition
ainst &c so forth. And the said Margaret Creek by her
Attorney aforesaid, saith that she by any thing by the said
William Wilkins above in pleading alledged ought not
be precluded from having and Maintaining her Petition
aforesaid against him, because she saith that she in the
ay of preferring the Petition in this cause was a free woman
d of free Condition, and not a Slave as the said William
Wilkins above in his plea hath alledged: And of this she

puts

puts herself upon the Country: And the said William Wilkins
in like manner and so forth. Whereupon is given to the
Sheriff of Baltimore County that he cause to come before
the Court here, twelve good and lawfull Men of his Bailiwick
by whom &c so forth, and who neither and so forth, to recognize
and so forth, because as well and so forth: Which said Sheriff
to wit Cornelius H. Gist Gentleman maketh return, that
he hath here twelve and so forth as he was commanded, which
Jury being called come and are as follows, James H. McCullagh
Charles Davidson, Richard Gwason, William Duncan, John
Bridenbaugh, George Reypold, Walter Crook, Andrew Clopper
John Stark, John Miller, Jacob Miller and Barry, who being
duly elected, tried and Sworn to say the truth in the premises
upon their Oath do say that the said Margaret Creek on the
day of preferring the Petition in this Cause was a free woman
of free Condition as the Petitioner aforesaid in her said Petition to
the Court here preferred against the said William Wilkins within
hath alleged: And the said William Wilkins by his Attorney aforesaid
saith that the Court here ought not to proceed to give Judgment
in and upon the said Verdict, and prays that Judgment against
him in and upon the said Verdict by the Jurors aforesaid in form
aforesaid given may be set aside. 1 Because the Jury, the morning
after the Trial of this Cause when they were called on to deliver
in their Verdict, delivered the same by their Foreman Vica Voce,
contrary to the express direction of the Court given to said Jury at
their adjournment on the preceding evening that the said Jury
should after they had agreed on their Verdict and before they had
separated, seal up their said Verdict and deliver it so sealed
to the Court at their next Meeting on the following Morning. 2d
Because the said Jury after they had retired from the Bar, during
their deliberations and before they had agreed on their Verdict,
did eat and drink certain provisions, furnished and provided
for them, by and at the expence of the Petitioner ~~or~~ her husband

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foresaid when and where the Court will take the same
to consideration, and prays leave of the Court here further
to imparle until the first Monday in August next and to
him it is granted, the same day is given to the said Margaret
Creek also. At which said first Monday in August in the
year of our Lord one thousand seven hundred and ninety nine
came again into the Court here, as well the said Margaret
Creek by her Attorney aforesaid, as the said William Wilkins by
his attorney aforesaid: And the said William Wilkins by his
Attorney aforesaid, as before defends the complaint aforesaid
wrongs & where the Court will take the same into consideration
prays leave of the Court here further to imparle until the
third Monday in November next and to him it is granted
the same day is given to the said Margaret Creek also.
At which said third Monday in November in the year of
our Lord One thousand seven hundred and ninety nine
came again into the Court here, as well the said Margaret
Creek by her Attorney aforesaid as the said William Wilkins
by his Attorney aforesaid. And the said William Wilkins by
his Attorney aforesaid, as before defends the complaint aforesaid
and saith that the said Margaret Creek ought not to
have or maintain her petition against him, because he
saith that the said Margaret Creek in the day of preferring
her Petition in this cause was a Slave, and of this he is
ready to verify: Whereupon he prays Judgment if the said
Margaret Creek ought to have or maintain her petition
against &c so forth. And the said Margaret Creek by her
Attorney aforesaid, saith that she by any thing by the said
William Wilkins above in pleading alledged ought not
to be precluded from having and maintaining her Petition
aforesaid against him, because she saith that she on the
day of preferring the Petition in this cause was a free woman
and of free Condition, and not a Slave as the said William
Wilkins above in his plea hath alledged: And of this she

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puts herself upon the Country: And the said William Wilkins
in like manner and so forth. Whereupon is given to the
Sheriff of Baltimore County that he cause to come before
the Court here, twelve good and lawful men of his Bailiwick
by whom &c so forth, and who neither and so forth, to recognize
and so forth, because as well and so forth: Which said Sheriff
to wit Cornelius H. Gist Gentleman maketh return, that
he hath here twelve and so forth as he was commanded, which
Jury being called come and are as follows, James H. McCullagh
Charles Davidson, Richard Gwason, William Duncan, John
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in and upon the said Verdict, and prays that Judgment against
him in and upon the said Verdict by the Jurors aforesaid in form
aforesaid given may be set aside. 1 Because the Jury, the morning
after the Trial of this Cause when they were called on to deliver
in their Verdict, delivered the same by their Foreman Vica Coca,
contrary to the express direction of the Court given to said Jury, at
their adjournment on the preceding evening that the said Jury
should after they had agreed on their Verdict and before they had
separated, seal up their said Verdict and deliver it so sealed
to the Court at their next Meeting on the following Morning. 2d
Because the said Jury after they had retired from the Bar, during
their deliberations and before they had agreed on their Verdict,
did eat and drink certain provisions, furnished and provided
for them, by and at the expence of the Petitioner ~~on~~ her husband

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3d. Because when the said Jury were Sworn there was not any issue or issues joined on the Record in this cause between the parties, as will appear by inspection of the Record and proceedings thereof. 4th Because the Petition in this case was filed & trial thereon had in a Court held for the City & precincts of Baltimore; which Court had no Jurisdiction of the Case, because by Act of Assembly Petitions for Freedom can only be tried in the County Court of the County where the petitioner resides. But because the Court here are not advised to give their Judgment of on upon the premises aforesaid day therefore is given to the Parties aforesaid before the Court here on the second Monday in January next, to hear their Judgment thereupon. At which said second Monday in January, in the year of our Lord One thousand eight hundred comes again into the Court here, as well the said Margaret Creek by her Attorney aforesaid, as the said William Wilkins by his Attorney aforesaid: But because the Court here are not yet advised to give their Judgment of and upon the premises aforesaid, day therefore is given to the Parties aforesaid before the Court here on the first Monday in March next to hear their Judgment thereupon. And now at this day to wit, the said first Monday in March, in the year of our Lord one thousand eight hundred, comes again into the Court here, as well the said Margaretta Creek by William McMechen her Attorney, as the said William Wilkins by Nicholas Brice and Samuel Chase Junior his Attornies. Whereupon all & singular the premises aforesaid being by the Court here seen heard and fully understood, and Mature deliberation thereon had, for that it seems to the Court here, that the said Verdict for the reasons aforesaid set forth, ought not to be set aside: Therefore it is considered by the Court here that the said Margaret Creek the Petitioner aforesaid be henceforth and discharged of and from the service of the said William

Wilkins

Wilkins and that the said Margaret Creek the Petitioner aforesaid go thereof without day and so forth. And it is also considered by the Court here, that the said Margaret Creek the Petitioner aforesaid recover against the said William Wilkins the quantity of Seventeen hundred and eighty three Pounds Sixteen for the Costs and Charges of the said Margaret Creek which she hath laid out & expended in and about the prosecution of the Petition aforesaid in this behalf: And that she have her Execution thereof against the said William Wilkins and so forth.

Test. William Gibson Clk

Baltimore County Sc. I hereby certify that the aforegoing is a true Copy taken from the Record of Proceedings of the Court aforesaid between the Parties aforesaid. In Testimony whereof (The Seal of Baltimore County Court) (to this Exemplification, the same being first duly stamped) I hereunto set my hand and the Seal of the County Court aforesaid this twenty sixth Day of October One thousand and eight hundred

William Gibson Clk of Baltimore County Court

Without having proved that the Negro Margaret therein mentioned was the same Person named in the Deposition of Mrs Elizabeth Chew herein before stated and the Court permitted the said Record to be read as Evidence of the Pedigree of the Petitioner Whereupon the Defendant by his Counsel excepted to the Opinion of the Court and prayed them to sign & seal this his Bill of Exceptions which is accordingly done this 13th May 1812

Thos Worrell (Seal)

Robert Moody vs Richard Jones } At the Trial of this Cause in addition to the Several matters before stated the petitioner Called Cesar Boose a Mulatto Man with a wooly Head as a witness

this behalf having first proved by competent testi-
mony that the said Boose had been sworn as a witness
without any objection being made in a petition for
dom against John Paca in Queen Anns County Court
out ten years ago — They also proved that Mr.
Richard Jones the Defendant purchased the said
Robert Moody the petitioner from Mr. William
Paca fourteen or fifteen years ago, and that John
Paca was the only child and representative of
the said William Paca — Whereupon the defendant
his Counsel objected to the admissibility of the
witness alleaging him to be a negro of the discrip-
tion precluded by the act of assembly, but the Court
determined that it was incumbent on the defendant
prove that the said Boose was a negro slave
free negro descended from a slave and there being
no witness called to establish either of those facts
the said Cesar Boose was permitted by the Court
testify — Whereupon the Defendant by his Counsel
excepted to the opinion and direction of the Court
and prayed them to sign and seal this his Bill
of Exception — Thos Worrell (Seal)

Maryland, Queen Anns County to wit

I hereby Certify that the aforegoing is truly and exactly taken and Copied from the Records and Proceedings of Queen Anns County Court —

In Testimony whereof I have hereunto set my hand and Affixed the Seal of my Office this twentieth Day of May Anno Domini Eighteen hundred and twelve —

John Browne Clk
of Queen Anns County Court