called Quakers do solemnly and sincerely declare and affirm to be true the several matters contained in the within deposition —

Affirmed to before ——— Robt Couden

The Deposition of John Welch of Robert 62 years old being duly sworn on the Holy Evangels of Almighty God saith that he has known Alice Taylor a Witness sworn in this Cause more than 40 Years believes she has lived alla nearly all that time in the Neighbourhood of this Deponent and has always supported a very good fair and honest Character insomuch that this Deponent never heard any the smallest Charge against her: This Deponent also knew and was well acquainted with the father of Alice Taylor (John Wells) who also maintained the Character of a Worthy honest Man and was well received and esteemed in the Neighbourhood. This Deponent also knew all the Family of the said Alice Taylor and among others Elushington Gardner her Sister a Witness sworn in this Cause; and the whole Family and the said Gardner among others supported a very fair, unblemished Character — and the said Elushington Gardner has lived within a few Miles of the Deponent during nearly forty years last past; and further this Deponent saith not — Sworn this 25th day of May 1792 before me the subscriber Justice of the Peace for Ann Arundel County. Admitted Credible by Witness — James Mackubin

Interrogatories on the Part of the Defendant

1 — Do you know the Parties in this Suit?

2 — Do you know Esther the Mother of the Petitioner?

3 — Did you know Jaffy the Mother of Esther?

4 — Did you know Kate Booth the Mother of Jaffy: if you, what was her Complexion, and what sort of Hair had she and how long has she been dead?

5 — Was Kate Booth a Slave, or a free person, and if free, how did she obtain her freedom?

6 — Did you know all and how many of her Children what were their names, and what were their ages?

7 — How long has Jaffy and Inda two of the Daughters of Kate Booth been dead? —

8th Have you heard and from whom that Jaffy and Inda or either either and which of them were born before the death of Mr Harrison commonly called King Harrison? —

9 — Have you any further knowledge of the subject if you relate it fully? —

On the Part of Petitioners —

1 — Are you Interested in the Event of this Petition either by holding Relations of the Petitioner or otherwise? or are you related to the Defendant? —

2 — Have you ever known any application on the part of any of the Descendants of Kate Booth for Freedom or any Measure taken to Prevent such application? —

3 — Was there ever any Conversation where you were present concerning Kate or her Childrens being free? if you relate it, and between whom it took place? —

4 — Did you ever hear any Conversation respecting the Mother of Kate and between whom was it, and what? —

5 — When died Mr Harrison commonly called King Harrison die? —

+ John Carr of Anne Arundel County aged seventy Eight years and upwards being sworn on the Holy Evangels of Almighty God on the Interrogatories exhibited in this Cause, saith and answer to first Interrogatory, that he knows them —

2? — Answers — No.

3? ——— No.

4th — Answers he knew old Kate, but not by the Name of Booth, she was a mulatto, and her hair was woolly, and he does not know how long she has been dead —

5th — He never knew any other than that she was a slave, he has heard from his father and Grand father that she was set free by King Harrison, who they said had a Child by her whose name was Will Booth —

6th — He did not know any of her Children —

7th — He knows not ——