

To the Honorable Henry H Goldsborough  
Judge of the Circuit Court for Talbot  
County

The Petitioner Mary Jane Bailey a  
free-colored woman respectfully represents  
unto your Honor that she is the mother of  
a colored boy named Charles Henry  
an infant of five years of age. who is  
afflicted & has been from his birth,  
and requires the constant attention of his  
mother

Your Petitioner further represents  
that the said infant Charles is now  
in the possession of one John Johnson a  
free colored man of Talbot County who  
refuses to deliver up said boy ~~up~~ to his  
mother

Your Petitioner claims that she is  
entitled as the mother of said infant  
to have the custody and control of said  
infant and manage and direct his  
services