

he has caught her with her Coats up & that rogue Tom Hughes with his Breeches down, & in such uncivil Actions not fit to be named. And further that he brought in none but rogues & whores with him, some from Newgate some from Bridewell & some from the whipping Post - Saying and that were the impudentest of them all, by your Petitioner's Wife she coming in his Servant, and also that her oath was false & malicious which he would prove. Now so it is that your Petitioner's Wife has been almost these five years in this Country without the least Blemish of immodesty that carping Envy could suspect either in her Behaviour speech or Carriage as is manifest to all her neighbours with whom she hath been conversant, & that her Education & former Life in England being known to diverse in this Country to be no other but honest modest & civil, but now by those slanderous speeches of the said Barber which hath so wounded her in her Credit Reputation & Honour (which is far dearer than life) that all the virtues of her former life is blotted and she blazed for a whore and Strumpett unless your Honour do grant her reparation against the said Barber which your Petitioner conceives you ought in Justice and Honour to do least this Slander for a Precedent for Futurity for such abusive fellows not only to abuse witnesses in Contempt of Government and lawfully summoned but also take the privilege to slander & abuse all Women let them be ever so innocent (no man's wife excepted) wherefore she humbly craves that the Cause might be tryed by an able Jury & she repaired according to the merit of the Offence.

And he shall ever pray

Henry Spinke Plt. } This Cause is respited till next Provincial  
 Luke Barber Def. } Court and the Court ordered the Clerk to take  
 the Depositions of all those now summoned in this Cause & to give Copies thereof either to Plt. or Def. (if demanded) whereby to prepare themselves against next Provincial Court

John Jerome Aged 24 Years or thereabouts saith upon Oath that at the Court at New Town Doctor Luke Barber called Henry Spinke's Wife Whore & said that he would prove it for he saith that he caught her with her Coats up about her middle & Tho. Hughes with his Breeches about his Heels & in most uncivil Actions And the said Doctor Barber further said that her Oath was malicious and false and thereupon threw it to Mr Hall & bid him Interit for he would prove it & said that he brought none but Whores & Rogues along with him out of England some out of Bridewell & some out of Newgate & she was the Errantest whore that came

Sworn in open Court before me Wm. Bidston Clk.

John Jerome

Peter Mills saith upon Oath that at St Mary's County Court held the 16th day of June last after Elinor Spinke had taken her Oath agt Doctor Luke Barber in a Cause depending in the said Court the said Barber called Elinor Spinke Whore & that he had taken her with her Coats up to her