

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 J. Jones, by his Attorney aforesaid
brings 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 thereto relating, be transmitted, to the high Court
of Appeals of the State of Maryland to be held at Eastern 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. Hark chief Judge and the Honorable
Samuel Purwell 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 J. 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 etc

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 ninety 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 Esquire Judge
Jeremiah Townley Chase Esquire Judge
William Goldsmith Esquire Sheriff
John Quinn Clerk

In the record of proceedings of the same Court,
among others are the following to wit
Thomas Carver or Be it remembered, That
against on the Second Tuesday of
Samuel Lloyd Chew May Annodominii 1804
hundred and Ninety two

Thomas Carver by Gabriel Duwall his attorney petitioned
the General Court herein Court sitting, his petition
Freedom against Samuel Lloyd Chew in form follow-
ing to wit,

To the Honorable the Judges of the General
Court. The petition of Thomas Carver humbly
sheweth that he is held in Slavery by Samuel Lloyd
Chew of Anne Arundel County, and he is advised that
he is entitled to his freedom, being descended in the
male line from a free Indian Woman, he therefore
prays your Honors the premises being considered, to
discharge him from the Custody of the said Samuel
Lloyd Chew should he prove his descent as aforesaid
and that Summons may issue from the said Samuel
Lloyd Chew, to answer unto this petition returnable
immediately; And he will pray to -

G. Duwall for Pet.

Whereupon it is ordered by the Court here
that Samuel Lloyd Chew of Anne Arundel County
not remove the aforesaid Thomas Carver out
of this State nor obstruct him from attending this
Court from time to time in support of his petition for
freedom preferred against him the said Samuel Lloyd Chew
in the mean time to feed cloath and use the
said Petitioner well. And on motion of the said
Thomas Carver by his attorney aforesaid, It is order-
ed by the Court here that the writ of the State
of Maryland of Subpoena issue to the Sheriff of
Anne Arundel County against the said Samuel Lloyd
Chew to answer to the petition aforesaid of the

¹²
said Thomas Carver; which accordingly issues in
form following to wit, -
The State of Maryland 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 do and appear before the Judges of our
General Court now sitting at the City of Annapolis
to answer unto the petition of Thomas Carver, pre-
ferred against him for freedom. Whereof 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 Justice of
our said Court the 8th day of May Anno Domini
1792. Signed the 12th day of May 1792.
(G.O.) M^o Gwinm Clerk

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 ordered to wit
"Summoned W. Goldsmith Sheriff"
and the said Samuel Lloyd Chew by William Cooke
and Philip Harton Esq. his attorney, appears in
Court here and defends the Complaint aforesaid
when and where the said Court will take the same
unto Consideration and prays leave of the Court here
to impear until the next Court; and he hath
it; and the same day is given to the petition
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 impare 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, depends the Complaint aforesaid when and where the Court will take the same into consideration and prays leave of the Court to impare 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 depends the Complaint aforesaid when and where the Court will take the same into consideration and prays further leave of the Court here to impare 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 one thousand seven 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 depends the Complaint aforesaid when and where the Court will take the same into consideration and prays further leave of the Court to impare 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 process 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 a 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 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 defined 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 thirty
three years being sworn on
the Holy Evangel of
Almighty God, in this Cause ^{that} he know 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 re-
member the names of any of the servants about the
House, nor did he ever hear, white 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 de-
scendant 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.

J. Bullen

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

That she this Dependant never heard either from
Mrs. Oulamy, Mr. Edward Highman, her father or
from her late husband Mr. Bennet Chew or from
any other person that there was an indian
girl brought up in Shalemon Lloyd's family on Wye
Island and this deponent 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 deponent saith that in the year fifty two
or fifty three she this Dependant intermarried with
Mr. Bennet Chew of Annapolis and after marriage
she this Dependant and her husband lived with
Mr. Oulamy of Annapolis two or three months only
and this Dependant saith that she this Dependant
has understood that Margaret the mulatto woman now
claiming her freedom did live in Mr. Oulamy's family
but who she waited on she this Dependant does
not know. And this deponent saith that to her
knowledge she has no negroes or ever had any
descendants from negro Margaret's Mother or Grand
Mother and this Dependant saith that some time
before her marriage negro Margaret was dismissed
from Mr. Oulamy's service for misconduct and sent
back to Wye Island and this Dependant further saith
that she has heard and always understood that the
negroes on Wye Island were slaves and further saith
not

at. M. Chew

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

of July 1792.

Edward Barrig

Richard Pilghman Senior 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 Philmore Lloyd's 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 Anne's County May 25. 1794.

John Sayer Blake aged 60 years being sworn on the Holy Evangelists of Almighty God deposes and saith that he has heard his mother mention a Cook Wench on the Island, commonly called Cheas 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 Philmore Lloyd's 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 Eighteen 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 likeness to an Indian, he was son of a Negro 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.

M^r. Thos Blake

Thereby 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 Anne's County this 17th day of October 1792.

J^{es} Emory

I Am Mason aged about eighty one years and upwards being sworn on the Holy Evangelists of Almighty God deposes and saith that she never heard either from her mother or any other person of an Indian Girl being brought up in Philmore Lloyd's family or of any Indian Girl living on Wye Island on which Island the said Lloyd lived. And she truly 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 deponent's mother died soon after she came into this County and believes she never was on the said Island. That this deponent was only once at the house

of Said Philimon Lloyd's said Wye Island where
she was a Girl. That this deponent does not know
that her Mother ever practised Midwifery & believes she
did not. This deponent's Mother died when she this
deponent was about seven or eight years of age and
that she this deponent never did practise Midwifery
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 five or seven years old
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 lifetime
since lived in the neighbourhood of the said and that
she always heard and understood that the negroes of
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 Indian
came to her, and about a month after two Women
came also and made enquiry about free Indian
Moll who they said since 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 did tell
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 Philimon
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 Philimon Lloyd's family
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 Chas being Cross examined and
Interrogated by William Pace answered and
saith that negro 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 25 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 Oulany 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 child with her but was pregnant at the time.

That when she mentioned to her husband Mr J. Chew what Mrs Sepburne 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 know 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 sister to Mrs Sepburne say any thing upon the subject. That she was often at her house as was Mrs Sepburne also and must have seen the said Margaret in her family but that she never had made the like enquire of Mrs Thomas as she did of Mrs Sepburne that she had understood from Mrs Sepburne 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 Sepburne say that she ever paid a visit to Wye Island Mrs Chew further answers 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
Elizabeth Chew

Witness
Elizabeth Cady Chew
Interrogators to Mrs Elizabeth & M^{rs} Blinnon of Annapolis by M^{rs} Paed

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

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

3^d Were not Betty Jackson and yourself employed to manage Mrs Oulany's family and was it not Mrs Oulany's practice 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 separate bundles for each young and old

- 4th Did you know the Mutatto Girl called
Margaret who lived in the family
- 5th Did you ever hear from Mr. Oulany or the
Said Betty Jackson or any other person that
the Said Margaret was entitled to her freedom
- 6th Did you ever hear from Mr. Oulany 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 Mr. Oulany's Negroes that the said Mar-
garet was descended from an Indian Woman
- 8th Did you ever hear from any person whatever
that an Indian Girl was brought up in
Pilemon Lloyd's family on Wye Island -

The Depositions of Mr. Elizabeth M. Clemon
of the City of Annapolis in the State of Maryland
aged about seventy years taken before Allen
Luyam Esquire one of the Justices of the Peace
for Anne Arundel County in Said State at the
House of John Wilcutt in the Said City on the twenty
first day of September fourteen hundred and Ninety
two being first duly sworn to the foregoing In-
terrogatories answereth as follows -

To the first Interrogatory saith that she went to
live in the family of Mr. Henrietta Maria Oulany
about the year fourteen hundred and Fifty and
continued there about three years -

To the second Interrogatory saith that she knew
Betty Jackson who lived in Mr. Oulany's family

at that time, and that she believes the Said
Betty Jackson had then lived there about thirty years
To the third Interrogatory saith that Betty Jackson
and this Deponent were employed in the Management
of Mr. Oulany's family that she remembers it was
the practice of Mr. Oulany every year to have a
list of her Negroes Names and Ages sent to her in
order to ad and their Cloathing for them and that
Said Cloathing was made up in separate bundles
for each Negro Young and Old -

To the fourth Interrogatory saith that she
knew the Mutatto Girl named Margaret
To the fifth Interrogatory saith that she never
heard Mr. Oulany, Betty Jackson or any other
person say that the Said Margaret was entitled
to her freedom

To the sixth Interrogatory saith that she never
heard from Mr. Oulany or Betty Jackson or from
any of the family that the Said Margaret was
descended from an Indian Woman on Wye Island
or elsewhere -

To the seventh Interrogatory saith that she
never heard from Margaret her self or from
Mr. Oulany's 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 Quym

Edward Coursey aged about thirty nine years being sworn on the Holy Evangel of almighty God deposite and faith.

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 Wederstrands aged about fifty two years of age being sworn on the Holy Evangel, deposite and faith -

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 came 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 Wederstrands

I hereby certify that the foregoing deposition of Mrs Mary Wederstrand was taken and subscribed before me one of the Justices of the Peace for Queen Anns County this 17th day of October 1793. Art Emory

Petition for Freedom

Negro } Interrogatories to Daniel Oulany
J. Chew } 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 Philmon 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 and his wife or Daniel Oulany and his wife Henrietta Maria (who was the widow of the said Samuel Chew) or in the life time of the said Henrietta Maria Oulany who joined the said Daniel Oulany were descendants of an indian Woman

The Answer of Daniel Oulany 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 1792
Geo. Salmon. Daniel Dulany

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 alleging that they are the descendants
of an Indian Girl brought up in the family of
old Shilmon 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. Dulany and as you
have lived many years on Wye river you
must be able to give good information of
such Claims to Freedom if any justly exist. I
will therefore thank you to take the first oppor-
tunity of giving your Depositions on the following
Interrogatories -

- 1st Did you ever hear of such an indian girl
brought up in S. Lloyd's 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 of Mr. Dulany's

Estate and Mr. Dulany's ²⁴ estate on the Island.
4th How long have you lived on Wye river and
in the neighbourhood

5th Have you not had a general intercourse
with the owners of the Island and the
old neighbours about it

6th 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 Capt
Lloyd's & I will send for it -

I am Dear Sir

Yr. H^{ble} Serv^t
Wm. Pava

It is agreed by Counsel -
Depositions shall be taken
this way subject to any
further Interrogatories either
may sent afterwards
John Draceo Esq.
Salbot County J^{es}

21st July 1792.

The Deposition of John
Draceo of Salbot County aged seventy four years,
who having been solemnly sworn on the Holy Evangelists
of to true answers make to the foregoing Interro-
gatories and thereon to declare the truth the
whole truth and nothing but the truth
Deposeth and saith as follows vizt.
In Answer to the first Interrogatory. That
he never to his knowledge heard of any

Indian girl brought up in Phil. Lloyd's 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 or what was then
called Cheves or Dulany's Island and now
belonging to Mr. Saca and Mr. Barclay were
descendants of such Indian Girl or any other
Indian whatever.

To the third Interrogatory the Deponent answers
that he was an appraiser of both Mr. Dulany's
and Mr. Dulany's Estates on the said Island found
in the first with a Mr. John Clayland of Queen
Anns County deceased and in the second with
Mr. John Nicholls of Talbot County also deceased
that Mr. Walter Dulany deceased attended the
first appraisement and that he also attend the
second with Messrs. Samuel and Philimon 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

21.

John Spruce
The above Deposition made and sworn to
before me the subscriber one of the Justices of
the peace for Talbot County this 20th day of
July 1792
W. Dawson

John Sumner aged fifty nine years being sworn
on the Holy Evangelists of almighty God deposes
and faith that he was an overseer on Wye
Island in the year fourteen hundred and fifty
five and lived there as an overseer from or
eight years that he never heard or understood
that an Indian Girl was brought up in Phil-
mon Lloyd's family or that any Indian Girl or
woman lived upon the Island and the Deponent
further faith 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
fort were negro slaves. And the Deponent
further faith that he knew a man who
lived on the Island called Indian Jimmy but
that he ^{was} always spoken of and considered
as a negro slave and that he never heard
any thing to the contrary and the Deponent
faith that Basil Warfield was the Mana-
ger of the Island and the principal
overseer when the 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 Lano who had been manager for many years on Wye Island before said Warfield and that he lived five years with said Lano after said Lano 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 negro 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 1792.

John Roberts

The Deposition of Lewis Scrivener aged about 50 years the said Scrivener being duly sworn deposes as follows: That at the age of fourteen he went to live in the family of the late Col. 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 son Saml. Chew and lived on the Land where he was formerly overseer, That ever since he lived in the family of the said Col. 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 Barberly or some such name) that during the time he lived in the aforesaid Chews 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 Col. 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 Lewis ^{his} Scrivener
October 15th 1794 Sworn before ^{mark}
Sam. Harrison Jms.