The Deposition of John Welch son of Robert aged sixty two years being duly sworn in this cause saith, that he knew old Lenah, who belonged to Gafsaway Watkins and whom he got from Mrs Jones his Mother, she was a bright yellow woman, with remarkably long black straight hair, this deponent was young when he knew her and has understood she was an East Indian she had many children one of which was named Violet who was the mother of the Petitioner, this Deponent saith that Violet of living would be upwards of seventy years of age, this deponent knew Violet when she was about Eleven years old and used to see her often and thinks she must have been about twelve a fourteen years older than himself, this deponent further saith that about forty seven or forty eight years ago he heard Richard Watkins son of the aforesaid Gafsaway Watkins and in his life time curse the said old Lenah, and tell her that she wanted to be free, but that she never would, and further he does not remember to have heard of her claiming her freedom. Sworn before me this 5. day of February 1791.

Richd Harwood Jun.

The Deposition of Robert John Smith of Ann Arundel County aged forty four years or thereabouts being first duly sworn on the Holy Evangelists of Almighty God, saith that he was born in Annapolis and served his apprenticeship in the neighbourhood where Gafsaway Watkins deceased lived, and that he never knew the person called Lenah, nor ever in his life heard that such person or her descendants were entitled to their freedom until about eight or ten years since and that he at no time ever had any conversation with either John Sydings or Joseph Mayo deceased respecting Daniel the Slave of Samuel Watkins brother of Gafsaway Watkins, but that about eight or ten years ago the time above alluded to he recollects having a conversation with the said Samuel Watkins the master of said Daniel in which the said Samuel said that there was a talk that the said Daniel intended to try to get free, but that he was quite easy about it, for that he was no more entitled to freedom than that by Jacob, alluding to a boy then present who was then a slave of the said Samuel and still continues a slave in possession of his Widow and further this deponent says not.

Robt J. Smith

Sworn before Saml Chase,

The Deposition of Ann Watkins of Ann Arundel County of lawful age being first duly sworn on the Holy Evangels of Almighty God saith that she knows the Defendant in this suit but knew nothing of his Mother or Grandmother, that she has often heard old people in the neighbourhood talk about old Lenah, but does not remember the particulars of such conversation, except one that about thirty years ago or nearly about that time, there was a report that the descendants of some woman named Lenah intended to try to get free, and Mr Thomas Spragg deceased came to the house of Margaret Watkins the mother of this deponents husband and with whom this deponents husband then lived, and asked Margaret Watkins if she heard it, and said that they were going to try to get free, to which the said Margaret Watkins answered, that they ought to be free, and that it was their right upon which Mr Spragg told her to be still about it, and said he had some of the [illegible] this Deponent has often heard her Mother in Law talk about [illegible] she was no slave, and that she was not counted

a slave by the family, and she further saith that her Mother in Law has been dead about sixteen years, and was an Old woman when she died perhaps about sixty years of age, that she was the daughter of John Lamb and Elizabeth his wife who lived in Ann Arundel County near Queen Anne, and was the wife of Nicholas Watkins who has been dead upwards of twenty years as this deponent believes was eighty years old or upwards when he died, and she has heard him say that Lenah and her family ought to be free, Being asked if she heard Mr Watkins or Mrs Watkins give any reason why Lenah ought to be free? says she did not. Sworn to this fourth day of June 1791. before

Jno Bruce.

The Deposition of John Sydings of Ann Arundel County aged sixty one years or thereabouts being first duly sworn on the Holy Evangels of Almighty God, saith that he new old Lenah who he understands formerly lived with Robert Lockwood, and afterwards was in the family of Mrs Jones and afterwards in that of Gafsaway Watkins, that he knew Lenah when she lived at Mr Watkins forty years ago she was a yellow woman, and the depont thinks he never saw a person of her complexion before or since she had long black straight hair like the hair of an Indian, and he further saith that about seven or eight years ago he happened at the house of Joseph Mayo Senior late deceased, and the said Joseph Mayo mentioned that he had heard that Mrs Watkins's Daniel was making a moves to get free, and asked this Deponent if he had heard it, to which he answered, that he had, and on being asked by the said Joseph Mayo of whom he heard it, this deponent replied of Robert Smith, ay said Mr Mayo, Smith knows every thing, the said Joseph Mayo observed that he believed they had let it alone too long, and said he knew old Lenah when she lived with one Lockwood and that she was as free as he he was, but did not mention how she was entitled to her freedom, and told this deponent when he knew her first she was an apprentice Boy to Mr John Lappington, this deponent saith that Daniel before mentioned is the Brother of the Petitioner and Son of Violet, who the deponent understood always was the daughter of old Lenah and she was a yellow woman, and had something of the complexion of her Mother, And the deponent further saith that Lenah had not the looks of a negro or mulatto, and he knew Maria a daughter of Lenah's who was a very yellow woman, this deponent lived in the neighbourhood of the aforesaid Gafsaway Watkins and often saw Lenah, Sworn to before the Subscriber one of the Justices of Ann Arundel County this 25th day of October 1791.

Jno Bruce.

Thomas Gibbs aged upwards of 62 years being first sworn on the Holy Evangelists, of Almighty God, deposeth and saith that he has seen old Lenah at the time she was the property of Mrs Jones when she appeared to this deponent very aged, who was himself at that time about seven years of age, that he hath ever understood that the said Lenah was a slave and never has heard until lately that either she or descendants were entitled to freedom, the deponent farther saith that he knew Mulatto Moll who he is informed was the mother of Mary Batson and has always understood that she came a servant out of old Lockwoods family and served her time out, in the family of old William Richardson and was then set free, this Deponent farther saith that he has kn[illegible] Mrs [illegible] things ever since she was a small Girl, that she was [illegible] reputed [illegible]