Peg was Simple's Cook and intrusted with the Care of his House.

8th In. Are you acquainted with the Characters of the Family of the Petitioner and of those to whom she respectively belonged. If so, have you not heard that these Negroes were remarkable for their Intrepidity, Impudence and Understanding and that their Owners were industrious, fed and cloathed them well and made them work and gave them as much Liberty as usual?
Answer. I was Overlooker for Mrs Piles for 13 years who had several of the family of the Petitioner and during that time they behaved and conducted themselves very well, they were made to work, they were fed and cloathed well and had as much Liberty as usual.

9th In. Have you ever heard that the petitioner or any of his family claimed Freedom, or that they were entitled to it, At what time did you first hear such Conversation?
Answer. I have heard that some of the Family of the Petitioner claimed their Freedom upwards of Forty years ago and while I lived with Mr Pile, Betty Mingo sold a Hog belonging to her, and gave a 4lb of Tobacco to a Lawer who visited at Mrs Piles to plead for her Freedom.

10th In. Did you ever hear that this Family claimed their Freedom in any other way than that set up?
Answer. I have never heard that this Family claimed their Freedom in any other way than that set up.

11th In. Has the Petitioner been held in Slavery and reputed a Slave, were his Ancestors by the Female side held in Slavery and reputed to be Slaves, and for what length of time?
Answer. The Petitioner and his Ancestors by the female side has been held in Slavery, and reputed to be Slaves ever since I knew them.

Charles County Ct May 22nd 1792.
I hereby certify that the aforegoing Interrogatories and answers thereto given on Oath, have been attentively considered by the Deponent, and he declares the said Answers to be just and true, and these Answers to the Interrogatories to which the severally relate, according to the best of his recollection and belief which he further confirms by subscribing his name thereto.
Sworn and Subscribed before Wm D Bruce
Leonard Boarman
Admitted to be read in evidence.
G Duvall for Petr
Philip B Key for Deft

And whereupon the aforesaid Robert Thomas by his Attornies aforesaid also files in Court here the following Deposition, to wit.

Robert Thomas Pet.
vs
Henry Pile

The Deposition of Charles Llewellin aged thirty five years being sworn on the Holy Evangels of Almighty God saith that he knew a yellow Boy named Rob in the possession of Francis Hammersly, who belongs as the Deponent has since understood to Henry Pile, and he has seen a Negro man who drove Mr Hammersly's Carriage, who was said to be his Father; when he knew the boy, he was considered as the Slave of Mr Hammersly, or the Estate of Mrs Pile, whose Daughter he married; he does not know the mother of Bob, or his Grand Mother, Being asked if has ever heard and from whom, that Robert the Petitioner was descended from a White Woman, answers he has not.

Sworn to in Open Court.
Jno Gwinn Clk.

And as well the aforesaid Robert Thomas by his Attorney aforesaid as the aforesaid Reverend Henry Pile by his Attornies aforesaid enter into and file in Court here, the following Agreement, to wit,

Robert Thomas Pet. for Freedom in the General Court Oct. Term 1792.
vs.
Henry Pile

It is agreed that all Depositions taken in this case on ten days Notice to the Petitioner or Defendant's Council before a Justice of the peace shall be received and read in Evidence in all the Cases of petitioning Negroes under the Name of Thomas, claiming their Freedom as Descendants of a certain Betty Mingo otherwise called Betty Thomas, or her female Ancestors, on the General Question, touching the right of Betty Mingo, otherwise called Betty Thomas or her female Ancestors to Freedom under the Laws of this Country.

G Duvall for pet.
Philip B Key for Deft

And whereupon the aforesaid Reverend Henry Pile by his Attornies aforesaid, as before defends the Complaint aforesaid when and where the Court shall take the same into Consideration and prays further leave of the Court to imparle hereunto until next Court; and he hath it; the same day is given to the said petitioner also.

At which said next Court to wit the second Tuesday of May being the fourteenth day of the same month, in the year of our Lord Seventeen hundred and ninety three comes again here into the General Court as well the aforesaid Robert Thomas by his Attorney aforesaid as the aforesaid Reverend Henry Pile by his Attornies aforesaid; And the aforesaid Reverend Henry Pile by his Attornies aforesaid as before defends the Complaint aforesaid when and where the Court shall take the same