and never heard either from herself or any other person that she claimed her Freedom. That all of the Family descended from Betty Mingo were brisk, lively and active people and remarkd for being valuable house Servants and Cooks. That all the family with whom she was acquainted or ever heard of were considered Slaves, and that she never heard any person either before or since the present petition, say that any of them was entitled to Freedom, except themselves since the petitioner came forward with his claim. That Betty Mingo was Mother to Phia, who is Mother to Judah, who is mother to the petitioner. That this Deponant never heard the said family were called, or called themselves Thomas till the petitioner claimed his Freedom. Signed

Sophia Leigh.

Taken and sworn before
Henry H. Chapman.

Taken in Interrogatories filed by us and admitted to be read in Evidence.

G Duvall for Petr
Philip B Key for Deft

Charles County Sct.

William Swann of Allen's Fresh, aged about fifty four or fifty five years, having been sworn on the Holy Evangels of Almighty God deposed, That as near as he can recollect about forty four or forty five years ago, a certain Mary Curtis whom he supposed to be then near fifty years of Age, told him this Deponent that Charles Mingo and Betty Mingo had as much right to their Freedom as she (the said Mary meaning) "had herself. for their Mother was as white a Woman as she was" meaning as this Deponent supposes, herself. And this Deponent adds that the said Mary Curtis was a very fair Woman and had a remarkable good skin. That the said Mary Curtis died about twenty years ago. That he has known Robert Thomas the petitioner in the General Court against Henry Pile for about five or six years and that he has also known Henry Pile for about same space of time that the said Robert was reputed to be the slave of the said Henry and was by him the said Henry held in slavery ever since he has known them the said Henry and the said Robert. The said William Swann being severally interrogated on the various questions numbered from 1 to 9 both inclusive and contained in a certain paper entitled the Petitioner's Interrogatories, signed
G Duvall for petr. and being also examined on each and every of the Interrogatories contained in a paper numbered 1 to 23 inclusive

inclusive and signed Philip B Key for Deft, answered that he knew nothing relative to or concerning the contents of said papers respectively nor of Robert Thomas or this Case, more than is expressed in the above deposition, in confirmation of all which he hath hereunto subscribed his name.

Wm Swan

I do certify that the above deposition was sworn to before Me, and that the William Swan the Deponent here named attentively perused it before he subscribed his Name and made Oath thereto Given under my hand at Allen's Fresh this twenty first day of May seventeen hundred and ninety two.

Ben: Contee.

And the said William Swan being further sworn on the Holy of Almighty God on the twenty fourth day of October seventeen hundred and ninety two, and being asked if he knew Charles and and Betty Mingo abovementioned, answers he knows Charles very well, but did not know Betty that he recollects, and he saith that the said Mary Curtis knew them very well, and he has often heard her talk of them; and he further saith that Charles was a Mulatto with long black hair, and he has heard it often said in the Neighbourhood that the Father of Charles was a Mingo Indian. And he further saith that the said Mary Curtis lived at the house of the Deponents Father about fourteen years and was Nurse to the Deponent. Being asked what was the General character of Mary Curtis for veracity, answers, he never heard any thing against her. Sworn to before Me this 24 October 1792.

Jno Brice

Admitted to be read in evidence.

G Duvall for petrs
Philip B. Key for Deft

Charles County Sct.

At the request of Robert Thomas petitioner for his Freedom in the General Court against the Revd Henry Pile the following Deposition of Mrs Jane Digges Wife of Henry Digges was taken, The Queries and Interrogatories of the Council for Petitioner and Defendant being first severally propounded to her, to which she respectively gave the underwritten Answers.

Answers to petitioners queries.

I have known the petitioner Robert Thomas ever since he was born and have also known the Revd Mr Pile ever since he was a little boy, Have often heard it said in General Conversation that the Petitioner was descended from a free person but do not recollect where or from whom this Conversation ipsued. It happened when I was very young, and was probably amongst others from the Mingos
themselves