was hanged) that Priss was an old Black Woman with curled Wool on her head and much older than this Deponent, that he has heard that she had several other children but he was in no manner acquainted with or otherwise had knowledge that they were the children of Priss, nor does he believe that Priss was any way or in any other manner related to the savoys, than her son Tom who was hanged had Jane Barton to wife and it was said she had a son by Tom called Joe Barton: being asked if he knew either of the parties in this case; answers, no; and further saith not: Taken this 20th day of Octr 1794. — Sworn to Before — Thomas Coale. —

The Deposition of William Bateman of Ann arundel County of lawful age — Plaintiffs 1st Interrogatory, being duly asked. answers, that he knew Priss perfectly well, but did not know nor has he ever heard that she was in any manner related to the savoys. 2d — answers, no. — 3d — answers. that he knew Jane Barton, daughter of Sarah Savoy, but never heard her call Priss aunt. — 4th — answers, that he never heard Priss call Mingo, uncle, or in any other manner claim him with Mingo or any other of the savoy family, but it was a common custom for both Black and White to call him uncle throughout the neighbourhood especially the young people. — 5th answers, he never did. — 6th answers, in his fifty fourth year of his age. — 7th answers, that he never heard Priss or any other family say that she had a right to or claimed her freedom nor no other person whatever say she had a right or any of her family. Being further interrogated by Defendant respecting his knowledge of Priss who lived with Mr Gaither, and her connection with the savoy family, and her right to Freedom and whether she and her children lived and died in slavery): answers, that Priss lived and died the slave of Mr Gaither, that she had several children, namely, Sam, Sarah, Tom, Esther, and Bett, all that he remembers to be the children of Priss, that Tom, kept Jane Barton as his wife the daughter of William Barton who married Sarah Savoy and had one child called Joe which he believes is now a living, that Tom was hang for Robery committed at or near a Booth kept near West River meeting House, and further sayth that he heard Thomas Matthews say that he actually caught Mingo

savoy endeavoring to commit the act of Copulation with Priss who had been to mill and was at the same time somewhat intoxicated and also that he has heard Mingo bantered, as having a wish to take Priss as a wife or concubine: and further saith not. Taken this 20th Octr 1794. — Sworn to before — Thomas Coale. —

The Deposition of Philip Brown of Ann Arundel County of lawful age. — Interrogatories by Plaintiff — 1st Did you know Priss who lived with Mr Gaither and was she related to any of the savoys set free by Mr Lambert: answered, that he knew Priss very well but never heard her or any other person or persons say she was related to the savoys; being asked if he knew who was Priss's mother; answered, no; being asked if he knew Jane, daughter of Sarah Savoy, and if she had never lived with this Deponent, and did not Priss sometimes come to his house, and did not Jane call her aunt: answered, that he knew Jane Barton, daughter of William Barton who married or kept Sarah Savoy but Jane never lived with him nor was Priss ever at his house, and he never did hear Jane Barton call Priss aunt; being asked if he ever heard priss call any of the Savoy Uncle, Aunt or Cousin: answered, he never did; being asked if he ever heard any other person or persons say that Priss descended from the Savoys or was related to them: answers, that he never did hear that she was any way related to the savoys, excepting Tom, the son of Priss had Jane Barton for a wife who had one or two children by Tom, the eldest was called Joe, and is now a living for he this Deponent see him a few days part: being asked, of what age he was at this time: answered, about seventy two years; being asked, if he knew any other matter or thing respecting Priss or her right to Freedom: answered, that he knew Priss upward of Forty years ago, she was then an old woman fifty or sixty years old, that he knew Priss's children, namely, Sam, Sarah, Ester, Tom, Jenny, Nanny and Bet and also James, that Jenny was the mother of John Bartley, the present petitioner, that nanny was the mother of Edward Sheredan, who has petitioned against Mr Howard, that Tom was hanged for Robbing a woman of money and cloathes at or near a Booth kept a whitsuntide, many years ago, that he does not know of any of Priss's children that is now a live except Esther, that Priss and all her children that is dead, lived and died slaves, and he