That he knew Jenny who belonged to the Deponents father when the Deponent was born that his father got her by his mother, who was Mary ann Hoskins before her marriage; that his mother mother was one of the Neale family as he has understood; Being asked if he knew or has heard what her father, name was answers he knows not, but thinks it was Raphael Neale. That said Jenny when he first knew her belonged to Basil Brooke; that Basil Brooke married Henry Neale aunt to the mother of the Deponent being asked how Mrs Churn came by Jenny answers that he supposes Mrs Churn bought her of Raphael Brooke Son of the aforesaid Basil & Henry Brooke. Being asked if he knew the mother of Jenny. answers he did her name was Nell; being asked if he knows to whom Nell belonged when he first knew her answers to his Grand mother Neale or Mrs Jenny, who was sister to Henry Brooke aforesaid as he always understood. Being asked if he has heard his mother or any other person say that Jenny or Jenny aforesaid was descended from a white woman answers that he has heard his sister Mary ann Boarman say that Jenny asked her mother if she was not the offspring of Isa Paine or words to that effect but does not recollect what the answer was; and that he never heard any person say that Jenny or Jenny was descended from a white person. That the aforesaid Jenny and Jenny or sisters and Daughters of Nell aforesaid. Being asked if he ever heard, and from whom that there was a woman by the name of Shorter who lived in the Neale family answers he never did, but that he has heard there was a record of a marriage, but does not recollect to have heard between them.

Sworn to before me this 29th day of May 1794.

A Bullen.

Teresa Shorter
Joseph Boarman } The Deposition of William Simms of Charles County aged Eighty three years or thereabouts being sworn on the Holy Evangels of Almighty God deposeth and saith that when he was a lad he knew a woman by the name of Betty Shorter and he has seen ~~and~~ her twice or oftener at his fathers who then lived near Zachiah swamp in charles County that the said Betty Short was a white woman and it was generally understood was not a country born Woman, but from what country she came he has forgot he remembers very well to have seen her playing at Ball at his Fathers with some Girls and Boys and that she would catch the Ball in her apron and what makes the Deponent recollect her more strongly he remembers that in taking hold of her apron to catch the Ball she pulled up her petticoat with her apron and he saw above her knees; and he remembers to have seen her at Dr Nathaniel Sutes or at Justerian (Barches)

Barches or at both those places. Being asked how old she appeared to be at that time answers he cannot say it has been so long ago but she was a woman and he thinks was about thirty or forty years old; and he remembers to have heard it said that she lived with a Mr Neale in Cobrech in charles county. Being asked if he knew any of her children answers he did not, but has heard it said in the neighbourhood that she had two or three children. Being asked whether her name was short or Shorter answers they used to call her Betty short and he does not remember that she was called Shorter, and she did not appear to have any stain of the Malatto in her.

William his W mark Simms

Sworn to this 9th day of October 1792 before the Subscribers one of the Justices of Anne Arundel County.

Allen Dugan

To be read in Evidence at the Trial

Philip B Key
G Duvall

Robert Shorter
" } Petition for Freedom in the General Court
Mary Neale } Petitioners Interrogatory

1 Do you know the parties in this suit and how long have you known them?

2d Do you know or have you understood and from whom ~~when~~ that the petitioner or any of the people of the family who stile themselves short or shorter are descended from a white woman, if yea what was her name and with whom have you understood she lived or died?

3d Did you know Edward Neale son of Anthony Neale of St Marys County deceased. or Roswell Neale Son of the said Anthony or any and which of the children of the said Anthony Neale? if yea where did they reside and die respectively?

4th Did you know Malatto Mary who formerly belonged to Edward Neale son of Anthony Neale and who afterwards died in the possession of Henry Rosier, who intermarried with a Daughter of said Edward Neale If yea, did you at any time heretofore understand or hear and from whom, that the said Mary was descended from a white woman and what was her name?

5 Did you know or have heard and from whom that a white woman by the name of Elizabeth Shorter lived in the family of Anthony Neale aforesaid and after his death in the family of one of his Sons or with which of them did she live that you have heard?

6 Have you heard or understood that any of the people now called Shorts or Shorters were descended of a white woman or that they were (bed)