To the 1st. That he does not know George Shorter, but has known Henry Neale about forty years.

2d. He knew Appy a negro woman who belonged to Mr. Henry Neale Father, but does not know and never heard that she was mother to the Pet.

3 He thinks he has seen Jane Short, she was a mulatto woman, he does not know what sort of hair she had nor how long she has been dead.

4th. He does not know nor has he ever heard how Roswell Neale came by the possession of the said Woman.

5th. He never knew nor did he ever hear how many Brothers Roswell Neale had in short he never heard that he had any Brothers.

6th. He does not know nor has he ever heard who was the father of Roswell Neale.

7th He always considered Jane Shorter as a Slave and never heard any one say that she was descended from a free a white woman.

8th He does not know nor has he ever heard how many children the mother of Jane Shorter had. nor did he ever hear a know of her having any other child besides Jane Shorter; nor did he know the mother of Jane Shorter.

9th. He does not know nor did he ever hear that Jane Shorter had any Children.

10th He did not know any mulatto Woman by the name of Patty Shorter he has seen but did not know John Lancaster himself.

11th. He never knew Henry Rozer of Prince George County.

12th He knew no woman that belonged to Mr Rozer.

13th. He never heard nor does he know that the petitioner or any of his family or those stiling themselves Shorty or Shorters are descended from a free or white woman nor did he ever hear that any of them claimed their freedom till since they have petitioned.

14. 15. 16th. That he never knew or heard of Elizabeth Short or Eliz. Shorter or any thing respecting her.

Sworn to this 22d day of May 1794 before the subscriber one of the Justices of St Mary's County.

Jr. Smith.

George Shorter vs Henry Neale } Clement Gardiner (aged sixty one years) of saint Marys County being sworn on the Holy Evangels of Almighty God deposeth & saith that he hath been personally acquainted with a woman who was called Betty Brown (and who is the same woman he believes now called Elizabeth Daily) who was the reputed Daughter of Elizabeth Pillbrow (for more than forty years, that she generally bore an infamous character &

(was)

was reputed a woman of little or no veracity & not to be believed and one of the greatest Liars; That ever since this deponent first knew her she lived in the same neighbourhood not far from him; That this Deponent has understood the said Betty has of late years been in the poor House of St Marys County. That he knew the father of the Defendant his name was Henry Neale. That he has seen the petitioner but never untill a few years ago. Being asked if he knew Appy the mother of George? says he did not, but has heard of a woman of that name belonging to Henry Neale, He has seen Roswell Neale when he was a small Boy. and he was the reputed grandfather of the Defendant that when he was a Boy he knew Jenny Short a small woman who lived with Raphael Neale son of Roswell Neale Being asked if he ever heard who was the mother of Jenny Short answers he did not. Being asked if he knew any of the children of Jenny? answers he did know a man named Charles, who was said to be her son he lived with Raphael Neale deceased that he knew of no other child that the said Jenny had and that he should not have remembered the said Jenny but that it was said she was a Welch cappeard to be doubled with age when he was a Boy; that he knew Elizabeth Daily's mother & that she was alive about forty five years ago & has understood from general reputation that the said Eliz. Daily had been married twice before her mother died that he has from his infancy known Wm. Gibson son of Th. that he has always supported a fair and unblemished character as a man of veracity. Being asked how old he thinks Betty Daily was when he first knew her. answers she might be thirteen or fourteen years. Being asked how old he was when he first knew her. answers He thinks he might be twelve or thirteen years old. Being asked from whom he understood that Charles, before mentioned was a son of Jenny Short? answers from his uncle John Mason & not from any other person. Being asked what was the general character of Betty Daily? answers: That her character was bad few people believed what she said but was reputed to be a good hireling.

Allen Dugan.

George Shorter vs Henry Neale } Petition for freedom in the General Court. The Deposition of William Gibson of St Marys County aged twenty two years & upwards being sworn on the Holy Evangels of Almighty God saith that he knows Mr Neale the Defendant very well & has known him ever since he was born; that he has seen George the petitioner but does not know much about him. Being asked if he knew George's mother? answers he knew a woman named Appy who belonged to Henry Neale father of the Defendant who George Jr.

(his)