white woman. 3d was Patt always held & considered as a slave. answer she was. 4th Did you ever hear Patt or Nell the Daughter of Patt say that either of them was entitled to freedom. answer she did not 5th How old was Patt when you knew her. answer he believes she must have been sixty or seventy years old. Being asked by the petitioner if he knew the mother of Patt. answer he did not. and further this Deponent Saith not.

Joseph Lancaster

Taken and Sworn before Benjamin Lancaster

The Deposition of Teresa Lancaster aged fifty five years or thereabouts being first Sworn on the Holy Evangels of Almighty God deposeth and saith that she knows negro Clement the petitioner that she knew Nell who was the mother of Jane. Who this Deponent has been informed is the mother of the petitioner Clement that she knew Patt when she this Deponent was very young and that she has always heard that the said Patt was the mother of the before mentioned Nell, that Patt when this Deponent knew her was the slave of Capt. John Lancaster deceased being Interrogated by the Defendant James Neale. 1st Do you recollect the colour or complexion of Patt. answer she does and that she Patt was a Dark Mulatto. 2d Did you ever hear that Patt was descended from a free woman. answer she never did until a few years ago. When she heard one of Patts grand Sons say that the mother of Patt was a white Welch woman but never heard it from any other person. 3d was Patt always held and considered as a slave. answer she was. 4th Did you ever hear Patt or Nell the Daughter of Patt say that they or either of them was entitled to freedom. answer she did not 5th How old was Patt when you knew her. answer she does not know but she must have been very old as she was past labour and further this Deponent Saith not.

Teresa Lancaster

Taken and Sworn before Benjamin Lancaster (Jnr)

Charles County to wit. on the 28th day of april in the year seventeen hundred and ninety four the following Depositions were made and sworn to before the Subscriber one of the justices of the peace for Charles County aforesaid in pursuance of the above order from the General court in the presence of the plaintiff and Defendant after due notice being given to the plaintiff by the Defendant.

Ann Bateman of Charles County aged Sixty five years or thereabouts being first Sworn on the Holy Evangels of Almighty God Deposeth and Saith that she knew a negro woman the property of Capt (John

John Lancaster called Patt. Being Interrogated by the Defendant James Neale 1st Did you ever hear that she Patt or any of her Descendants called themselves shates or that they or either of them had and claim to freedom. answer she did not Being asked by the Petitioner Clement. 1st How old was you when you first knew Patt. answer Eleven or twelve years old. 2d Do you recollect the colour or complexion of the before mentioned Patt. answer a Dark Mulatto. 3d Do you recollect her having any children. answer do not remember her having any 4th Do you remember the colour of her the said Patts hair. answer that she does not. 5th How long did you live near her the said Patt. answer four or five years 6th was she considered a sensible woman or not. answer she was not considered sensibly and further the Deponent Saith not.

Ann her + mark Bateman

Taken and Sworn to before Benjamin Lancaster (Jnr)

The Deposition of Eleanor Pearson aged Eighty two years or thereabouts being first sworn on the Holy Evangels of Almighty God Deposeth and Saith that she knew Jane Shate the property of Roswell Neale of St Marys County the Brother of Raphael Neale of Charles County that the said Jane Shate told the Deponent that she was a sister to Patt the property of Capt. John Lancaster whose property she the said Patt died. Being Interrogated by the Defendant James Neale 1st Do you recollect the reason why Jane the sister of Patt was called Jane Shate. answer she was in common called so by Black and White but the cause I know not. 2d Did you ever understand that she was of a white or free descent. answer no. I never did. 3d Did you ever hear Patt called a Shate. answer I never did. Being asked by Clement the petitioner. 1st Did you ever hear the master or mistress of the Jane or Patt say that they or either of them were entitled to their freedom. answer I never did 2d How long did you live near Jane Shate. answer one year 3d was Jane the sister of Patt called Jane Shate when you first knew her. answer she was. 4th Do you recollect the colour or complexion of Jane Shate. answer a Dark Mulatto 5 was Jane Shate children called Shate. answer two of them as they were all I knew. 6th Did you know any thing of the mother of the aforementioned Jane or Patt or do you recollect ever hearing any person say they did. answer I know nothing of her. nor neither do I recollect ever hearing any person say they did. 7th How long since you first knew the aforementioned Patt or Jane Shate. answer about fifty two years ago. and further the Deponent Saith not.

Eleanor her + mark Pearson

Taken and Sworn before Benjamin Lancaster (Jnr)

True Copy Jno Gwinn Clk Gen Court W.S.

(Thos)