saith not. Sworn to this 4th day of August 1790. in open Court. —
Mary Batson a woman of colour and born of a Free woman whose mother was a Free white woman aged between sixty and seventy years being first duly sworn to say the truth in this cause deposeth and saith, that she knows the petitioner and has known him from a small boy, that she knew violet his mother ever since the deponent was a small girl, that she knew old Lenah Boston many years before she died, and that she thinks she has been dead upwards of Forty years that this Deponent was born in anne arundel County not far from the neighbourhood of Lenah and her descendants and has always resided in anne arundel that Lenah was a bright yellow woman with long black hair, which was straight; This Deponent further saith that she has always — understood that Lenah the Grand Mother of the Petitioner was a Spanish woman and often has heard her mother say that she was entitled to be free. The Deponent knew several children of the said Lenah viz Daniel, Ned, Toney, Cæsar, Simon, Nat, Bacon, violet, Sarah, Marcia she further saith that the Deponents mother was born on the Eastern Shore as she has informed her, and that she was brought over when young to anne arundel County and was brought up in the Swamp; that she was brought up by old Robert Lockwood in the swamp and she has often heard her mother say that she knew the mother of Lenah and she was a Spanish woman and that Lenah was very young when she came into this Country with her mother, and she has often heard her mother say that Lenahs mother died at Robert Lockwoods in his life time and was buried there and that she used commonly to wear a golden cross round her neck and that it was buried with her; The Depment being asked how old the Deponents mother was when she was born, saith she cannot tell but that her mother had sixteen children and the Depment was the youngest but two; That she has frequently heard her mother say that Lenah mother took care of her when she was young; This Deponent further saith that he has understood that Ned one of the sons of Lenah many years ago attempted to get his Freedom and that he was stopped at London Town when on his way to Annapolis and there whipt and prevented from going further. This Deponent saith that she has heard Ned say that he was whipped at London Town and his Indentures burnt and that he thought he was used very ill, and has understood that his masters name was Thomas Ratcliff and further she saith not. Being ask if Lenahs children were born before she came to this — Country? says no, they were all born in Maryland, This Deponent says she is now upwards of sixty years old and can remember Lenah ever since she was ten years old; Lenah had then three children; This Deponent being asked how long Lenah has been dead? says near forty

years. Sworn before the subscriber, this seventh day of August 1790. Allen Duvall. — The Deposition of John Welch son of Robert aged sixty two years being duly Sworn in this cause saith, that he knew old Lenah who belonged to Gassaway Watkins and whom he got from Mr. Jones his Mother, she was a bright yellow woman with remarkably long black straight hair; This Deponent was young when he knew her and has understood she was an East Indian she had many children one of which was named violet who was the mother of the Petitioner this Deponent saith that violet if living would be upwards of seventy years of age, This Deponent knew violet well when he was about — eleven years old and used to see her often and he thinks she must have been about twelve or fourteen years older than himself; This Deponent further saith that about forty seven or forty eight years ago he heard Richard Watkins son of the aforesaid Gassaway Watkins and in his life time curse the said old Lenah and tell her that she wanted to be free, but that she never would and further he does not remember to have heard of her claiming her Freedom. Sworn before me this 3d day of February 1791. — Richd. Harwood Jun.
The Deposition of Robert John Smith of Anne Arundel County aged forty four years or thereabouts being first duly sworn on the Holy Evangelists of Almighty God, saith that he was born in Annapolis & served his apprenticeship in the neighbourhood where Gassaway Watkins deceased lived & that he never knew the person called Lenah nor ever in his life heard that such person or her descendants were entitled to their Freedom until about eight or ten years since & that he at no time ever had any conversation with either John Hydings or Joseph Hayes deceased respecting Daniel the slave of Samuel Watkins brother of Gassaway Watkins, but that about eight or ten years ago the time above alluded to, he recollects having a conversation with the said Samuel Watkins the master of said Daniel in which the said Samuel said there was a talk that the said Daniel intended to try to get Free, but that he was quite easy about it, for that he was no more entitled to Freedom than that Boy Jacob, alluding to a Boy then present who was then a slave of the said Samuel & Still continues a slave in possession of his widow & further this Deponent says not sworn Before — Sam. Chase. — Rob. J. Smith.
The Deposition of Anne Watkins of Anne Arundel County of lawful age being first duly sworn on the Holy Evangels of Almighty God saith that she knows the Defendant in this suit but knew nothing of his mother or Grand mother; that she has often heard old people in the neighbourhood talk about old Lenah, but does not remember the particulars of such conversations, except one that about thirty years ago or nearly about that time, there was a report that the