descendants of some woman named Lenah intended to try to get Free, and Mr. Thomas Spugg deceased came to the house of Margaret Watkins the Mother of this Deponents Husband & with whom this deponents Husband then lived; and asked Margaret Watkins if she had heard it, and said that they were going to try to get Free, to which the said Margaret Watkins answered, that they ought to be Free; and that it was their right, upon which Mr. Spugg told her to be Still about it and said he had some of them. This Deponent has often heard her mother in Law talk about Lenah, and she always said she was no Slave, and that she was not counted a Slave by the family: and she further saith that her Mother in Law has been dead about sixteen years, and was an old woman when she died perhaps about sixty years of age; that she was the daughter of John Lamb & Elizabeth his wife who lived in Anne Arundel County near Queen Anne, and was the wife of Nicholas Watkins who has been dead upwards of twenty years and this Deponent believes was eighty years old & upwards when he died: and she has heard him say that Lenah and her family ought to be Free; Being asked if she heard Mr. Watkins or Mrs. Watkins give any reason why Lenah ought to be Free? says she did not. Sworn to this Fourth day of June 1791. – Before – Nr. Price. —

The Deposition of John Tydings of Anne Arundel County aged sixty one years or thereabouts being first duly sworn on the holy Evangels of Almighty God, saith that he knew old Lenah who he understands formerly lived with Robert Lockwood, and afterwards was in the family of Mrs. Jones and afterwards in that of Gassaway Watkins, that he knew Lenah when she lived at Mr. Watkins's forty odd years ago she was a yellow woman, and the Deponent thinks he never saw a person of her complexion before nor since she had long black straight hair like the hair of an Indian; and he further saith that about seven & eight years ago he happened at the House of Joseph Mayo senior late deceased, and the said Joseph Mayo mentioned that he had heard that Mr. Watkins's Daniel was making a move to get Free, and asked this Deponent if he had heard it, to which he answered, that he had, and on being asked by the said Joseph Mayo of whom he heard it, this Deponent replied, of Robert Smith: Ay said Mr. Mayo, Smith knows every thing; the said Joseph Mayo observed that he believed they had let it alone too long, and said he knew old Lenah when she lived with one Lockwood, and that she was as Free as he was; but did not mention how she was entitled to her Freedom; and told this Deponent when he knew her first, he was an apprentice Boy to Mr. John Sappington, this Deponent saith that Daniel before mentioned is the Brother of the Petitioner and son of Violet who the Deponent understood always was the Daughter of old

Lenah and she was a yellow woman, and had some thing of the complexion of her mother: And the Deponent further saith that Lenah had not the looks of a negro or mulatto, and he knew Maria a daughter of Lenahs who was a very yellow woman. This Deponent lived in the neighbourhood of the aforesaid Gassaway Watkins and often saw Lenah. Sworn to before the Subscriber one of the Justices of Anne Arundel County this 25th day of October 1791. – Nr. Price. — Thomas Gibbs aged upwards of 62 years being first Sworn on the holy Evangelists of Almighty God deposeth & saith that he has seen old Lenah at the time she was the property of Mrs Jones when she appeared to this Deponent very aged, who was himself at that time about seven years of age, that he hath ever understood that the said Lenah was a Slave & never has heard until lately that either she or her descendants were entitled to Freedom. The Deponent further saith that he knew Mulatto Moll, who he is informed was the mother of Mary Batson & has always understood that she came a servant out of old Lockwoods family & served her time out, in the family of old William Richardson & was then set free: This Deponent further saith that he has known Mrs Anne Watkins ever since she was a small girl, that she was the reputed daughter of Parson Spencer a man of very bad character & that she lives adjoining to his plantation & is considered a great injury to the neighbourhood from her connection with negroes: Being asked from whom he understood that mulatto Moll came out of Robert Lockwoods family? Answers that he cannot particularly recollect: Being also asked from whom he understood that mulatto Moll was the mother of Mary Batson? answers that he knew Moll who he is informed now calls herself Mary Batson when she was a small girl at which time she lived with her mother Mulatto Moll & that he thinks the said Mary Batson is about his age, & that he was born not more than a mile from the place where the said Mary was born as he is informed & believes. Being asked whether the said mulatto Moll was born Free or a Slave? answers that he has understood that she was born of a white mother by a black Father. Being asked whether he knows of any connection of Mrs Watkins with negroes other than negroes assembling at her House to hear preaching? answers he does not. Being asked when & in what numbers they assemble there? says chiefly by night & understands in numbers. Being asked if he knew any of the Brothers of Mary Batson? answers he knew Tom & Mark. Being asked whether they were considered as Slaves or Free persons? answers that he thinks he has understood that they were to be Freed at such an age.