

Petition Analysis Record (PAR)

Race and Slavery Petitions Project

University of North Carolina at Greensboro

Accession: # 20784116

Barren County, Kentucky

Salutation: To the Honorable Judge of the Barren Circuit Court in Chancery Sitting

Court: Circuit

Beginning Date: 25 March 1841

Court: Circuit

Ending Date: March 1845

Petitioner[s]: 9

Number of Pages in Petition: 6

Siller [part Indian]	Black	Female
Lucinda [part Indian]	Black	Female
Doctor Frankin [part Indian]	Black	Male
Hetty [part Indian]	Black	Female
Thomas [part Indian]	Black	Male
Clara [part Indian]	Black	Female
Sylvia [part Indian]	Black	Female
Stephen [part Indian]	Black	Male
Joseph [part Indian]	Black	Male

Defendant[s]

Anderson R. Bowles	White	Male
Malinda Munday	White	Female
George Munday	White	Male

Abstract:

Siller, a woman of color, sues for her freedom by virtue of being the granddaughter of an Indian woman in Virginia. She fears that in response to her freedom suit she will be "removed beyond the jurisdiction of your Honorable Court, and there secreted or sold" unless the court intercedes.

Subjects:

American Indians	black sues white	children of slaves
emancipation	fear of enslavement	freedom suits
interracial sex	legal rights	women, slave

Number of Pages in Related Documents 31

Related Documents: PARs #20784117, #20784120, #20784121, #20784122, #20784123, #20784124, #20784126, #20784127, #21681109; Affidavit, B. B. Crump, 24 March 1841; Decree, n.d.; Order, June 1841; Copy of

Petition Analysis Record (PAR)

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Barren County, Kentucky

Order, June 1841; Answer, Anderson R. Bowles, Malinda Munday,
and George Munday, 24 June 1841; Deposition, James Cummins, 23
August 1842; Deposition, James Hicks, 25 April 1842

Petition Result denied

Location Description: Records of the Circuit Court, Equity Judgments

Repository: Kentucky Division of Libraries and Archives, Frankfort, Kentucky

To the Honorable Judge of the Barren Circuit Court
in Chancery sitting humbly complaining would most
respectfully ~~state~~ ^{submit} unto your Honor, your Oratrix
diller a woman of colour and a pauper:

That your Oratrix is, and has
been for a series of years, ^{unjustly} held as a slave, and that
she is illegally so held, being the daughter and offspring
of a free woman. Your Oratrix states that her
mother whose name was Jemima (~~was~~ ^{alias} Mimma) was
in the state of Virginia Dinwiddie County held
for some time by one Manson Wardaway as a
slave, and that upon the day of
in the County of Dinwiddie and state of Virginia
her said Mother instituted a suit for her freed-
-om, upon the ground that she was free born,
being the daughter of an Indian Woman
who was free ^{born}. Your Oratrix also charges that her
said Mother obtained her freedom by said suit
upon the ground aforesaid. Your Oratrix charges
that about the time of the institution of said suit
by her said Mother as well as she now recollects
(your Oratrix being at that time small and only

upon the ground aforesaid. Your Oratrix Charges
that about the time of the institution of said Suit
by her said Mother as well as she now recollects
(your Oratrix being at that time small and only
about 5 years of age,) she was brought to the
State of Kentucky by one James G. Wick, and that
she was sold by the said Wick to one John F. Bowles
and that she was held by the said John F. Bowles from
that time until his death as a slave. Your Oratrix
states that upon the day of 18 the said
John F. Bowles departed this life intestate, and that
the County Court of Barren County (in which County
he died) granted a d. administration upon his estate to one
Anderson R. Bowles, and Malinda C. Bowles, ^{who took upon themselves the guardianship of} by whom
your Oratrix was held as a slave, until upon the
day of 18 the said Malinda C. Bowles intermar-
ried with one George Munday by whom and the
said Malinda C. she is still held as a slave. All
which your Oratrix Charges is contrary to equity and good

Conscience, and that she is by the law of the land a free
woman, which will more fully appear by a copy
of the record of the suit in Henric County Virginia
which will in due time be filed herein and when
filed made a part of this bill - Your Oratrix
prays your Honor the premises considered to grant her
the Commonwealth's writ of Habeas Corpus against the said
Anderson B. Bowles Malinda C. Munday and
George Munday all of whom she makes debt to
this bill, and that they ~~may~~ may be compelled to make
true and perfect answers to all and singular the
allegations of this bill upon their corporal oaths
as fully and completely as though they were
again repeated by way of interrogatory -

Your Oratrix would further represent
unto your Honor and she so charges that she
~~has good reason to believe and does believe from the threats of debtors that~~
~~of a certain Malinda C. Munday Malinda C. Munday, and therefore this writ can~~
be finally determined, that she will be removed
beyond the jurisdiction of your Honorable Court, and
there be secreted or sold, unless the said debt be
prevented from so doing by the timely interposition
of your Honor. She therefore prays for an injunction

be finally determined, that she will be removed
beyond the jurisdiction of your Honorable Court, and
there be secreted or sold, unless the said debt be
prevented from so doing by the timely interposition
of your Honor, she therefore prays for an injunction
enjoining and restraining the said debt and all
other persons from removing her beyond the
jurisdiction of your Honorable Court until this
suit can be determined, and that the Sheriff of
Barren County, be directed to take your Oratrix
into his possession and hire her out until this
suit may be determined; unless, the said debt
will execute bonds with good security in such
sum as your Honor may think proper, Conditions
~~to be your Oratrix's father's, not to remove~~
your Oratrix beyond the jurisdiction of your
Honorable Court before the determination of this
suit. And upon a final hearing hereof your
Oratrix prays your Honor to order and decree
that for the remnant of her days your Oratrix

shall be free. And also decreed and order that the
said debt be compelled to pay your Gracious & reason-
-able reward for his long services. And grant unto
your Gracious such other and further relief as may
be equitable and just and as in duty bound
she will ever pay Ye.

Cromwell & Butler for
Compt.

Re

the

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&

he
to that
and

and

and

and

and

Miss a woman of
colour
3 etc

Andrews with Bowles
Malinda C Munday
&

George Munday

18th. March 25. 1842
to by Mr.

N. Garnett Clerk

Sept 1842

This day personally appeared before the under-
signed Justice of the Peace of Warren
County, Vermont G. Hetch and made
oath that he is personally acquainted
with Silas a woman of colour, and
with Sylvia, Elora, Thomas, Stephen, Betty,
Lucinda, Joseph and Doctor Franklin, her
children, and that they are poor persons,
and that he does not know that they have
any property, and that they have heretofore
been, and still are held ^{and claimed} as slaves, and
that the proceeds and profits of their labors
has been, and still is claimed and held
by others given under my hand this
24th of March 1841. (B. B. Crump Jr)

Tells a summary of Colours Complaint
Anderson N Bowles & their wife

The said cause came on to be heard,
upon the bill, amended bill, the answer of the
adult defendants, and the answer of the
infant defendants by William Garbutt
their guardian ad litem, and the depositions
and exhibits in the cause and the Court
being now sufficiently advised of and
concerning the premises, ~~it is decreed~~
~~and decreed~~ doth adjudge, order
and decree that the Complainant is a
free person, ~~bona fide~~ ^{that} she shall
hereforth be exonerated from all claim
or pretensions of claim of the said defend-
ants to her services as a slave, and ^{that} she
shall enjoy all the privileges and rights
of a free person agreeably to law
and that said defendant pay to her

~~ordered that~~ ~~with~~ ~~the~~ ~~aid~~ ~~of~~ ~~the~~ ~~court~~
and decree that the complainant is a
free person, ~~liberally~~ ~~and~~ ~~she~~ ~~shall~~
hereafter be liberated from all claims
or pretensions of claim of the said defend-
ants to her services, as a slave, and ^{that} she
shall enjoy all the privileges and rights
of a free person agreeably to law
& that said defendants pay to her her
costs here expended.

Barren circuit Court 5th June term 1841.

Seller a woman of colour Compt^{ess} vs
Anderson R. Boulet & others Defts vs Chancery

This day came the parties by their counsel and the Compt^{ess} with the leave of the Court filed an amended bill herein and on the motion of the Compt^{ess} by counsel It is ordered that the Sheriff of Barren County take the Compt^{ess} into his possession and hire the Compt^{ess} out for the best price that can be had until the 1st day of April 1842 taking bond with good security to himself for the hire which when collected by the Sheriff is to be held subject to the order of this Court in this case provided however that hereafter in this cause may be a decree to retain the possession of the Compt^{ess} herein upon the Defts. Anderson R. Boulet & George Manning or the Deft in whose possession the Compt^{ess} may now be existing bond to the Sheriff for the use & benefit of the Compt^{ess} in the penalty of \$1000 conditional to have the Compt^{ess} forthcoming & to abide by & perform the final decree of this Court in this cause. It is further ordered that the order heretofore made in this cause relating the Compt^{ess} to prosecute It is said that a pauper be so amended that if the Compt^{ess} should be successful herein then should be a decree in Compt^{ess} favor for hire so much of the said hire as may be necessary to pay the legal costs

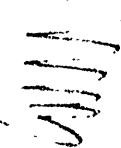
be executing & send to the Sheriff for the use & benefit of the
 Comptt in the penalt, of all the Comptt to have the Comptt
 forth coming & to abide by & pay the fine & fees of the Comptt
 this cause. It is further intent that the order should pay more
 in this cause relating the Comptt to prosecute it is find as a
 purport be so amount that if the Comptt should be successful
 here in then should be a decree in Comptt favor for him so
 much of the said fine as may be necessary to pay the legal costs
 the Comptt may incur in prosecuting this suit shall by order of the
 Court be applied to the payment of said costs

(Copy Dated) 17th June 1714

A witness, a girl of colour by Siller her next friend Comptt
 Anderson A Bowler & others } Depts
 The same Order } In Chancery

The same girl of colour by her next friend Siller Comptt
 The same Defendants }
 The same Order }

Silled Folter

17  E. H. Folter

A. H. Bowles Folter

Barron circuit Court Set June term 1841.
Lilera woman of colour Comptt }
Anderson R Bowles & others Defts } In Chancery

This day came the parties by their counsel and the Comptt with the leave of the Court filed an amended bill herein and on the motion of the Comptt by counsel It is ordered that the Sheriff of Barron County take the Comptt into his possession and hire the Comptt out for the best price that can be had until the 1st day of April 1842 taking bond with good security to himself for the hire which when collected by the Sheriff is to be held subject to the order of this Court in this cause provided however that the defts in this case may be allowed to retain the possession of the Comptt herein up on the defts Anderson R Bowles & George Munday or the Deft in whose possession the Comptt may now be executing bond to the Sheriff for the use & benefit of the Comptt in the penalty of \$1000 Conditioned to have the Comptt forthcoming & to abide by & perform the final decree of this Court in this cause It is further ordered that the order heretofore made in this cause releasing the Comptt to prosecute this suit as a pauper be so amended that if the Comptt should be successful herein there should be a decree in Comptt's favor for hire so

be executing bond to the Sheriff for the use & benefit of the
Comptt in the penalty of \$1000 Conditioned to have the Comptt
forthcoming & to abide by & perform the final decree of this Court in
this cause. It is further ordered that the order heretofore made
in this Cause allowing the Comptt to prosecute this Suit as a
pauper be so amended that if the Comptt should be successful
herein there should be a decree in Comptt's favor for him so
much of the said hire as may be necessary to pay the legal costs
the Comptt may incur in prosecuting this Suit shall by order of this
Court be applied to the payment of said costs.

A Copy Dated 11th June 1850

Lucinda a girl of Colour by Siller her next friend Comptt
Anderson, H Bowles & others }
The same Order }
Depts }
In Chancery }

Healy a girl of colour by her next friend Siller Comptt
The same Defendants }
The same Order }
In Chancery }

Stephen a boy of colour by his next friend Siller Comptt

^{as}
The same Depts } In Chancery
The same Orders

Joseph a boy of colour by his next friend Siller Comptt

^{as}
The same Depts } In Chancery
The same Orders

Sylvia a girl of colour by her next friend Siller

^{as}
The same Depts } In Chancery
The same Orders

Clara a girl of colour by her next friend Siller Comptt

^{as}
The same Depts } In Chancery
The same Orders

Thomas a boy of colour by his next friend Siller Comptt

Sylvia a girl of colour by her next friend tiller

The Same Deft } In Chancery
The Same Order

Calan a girl of colour by her next friend tiller Comptt

The Same Deft } In Chancery
The Same Order

Thomas a boy of colour by his next friend tiller Comptt

The Same Deft } In Chancery
The Same Order

Doctor Franklin a boy of colour by his next friend tiller Comptt

The Same Deft } In Chancery
The Same Order

Wm. W. Williams & Co. Attorneys

Deere March
1825.
in favor of Bowles.
see deere, of that
term.

Anderson vs Bon list

ad 5 aut.

Siller

W. H. Lane 7th filed
in Court

The answer of Anderson R. Bowler Malinda
Cobb and George Monday to a Bill in chancery
enjoined against them by Siller in the Ben
son Circuit Court their ^{protesting} respondents, saying in re-
sponse to the bill, all manner of exception to
the manifest error and mistake in said
bill contained for answer to so much there
of as they are advised in materials for them to
answer and answer to say that they admit
that the complainant has been held for a series
of years as a slave, and they deny that she has
been so held illegally, they deny that she is the
daughter and offspring of a free woman, it
may be true but you might do not know it.
That Compt's Mother was named Gemina or Minna
and was held for some time in the state of Vir-
ginia by Abraham Standen as a slave, they
deny that on the day of in the County of
Dumfries and state of Virginia said Compt's
Mother instituted a suit for her freedom upon
the grounds that she was free born. They deny that

... ..
That Compt's Mother was named Jemima or Minna
and was held for some time in the state of Vir-
ginia by Mason Handman as a slave, they
deny that on the day of ... in the county of
Dinwiddie and state of Virginia said Compt's
Mother instituted a suit for her freedom upon
the ground that she was free born, they deny that
Compt's Mother was the daughter of an Indian
Woman, and free born, they deny that Compt's
mother obtained her freedom by suit or otherwise.
It may be true but they do not know it that Compt
was brought to this state by James G Hicks, said
James G Hicks & ... sold the Compt to
said John F Bowler, as a slave & executed a Bill
of sale for her warranting said Compt to be a
slave for life for greater certainty they have filed
said Bill of sale as part of the ...
D. It is true that the said John F Bowler, ...
Compt from the state of ...

claim under his death, It is true that upon the
day of 183 the said John F. Bowler
deceased the life interest and that the County
Court of Warren County (in which County he died)
granted a distribution upon his estate to your
Nephew Anderson P. Billalinda C. who took upon
themselves the burden of a distribution, and
they had hold some Compt's bill, It is
true that on the day of your Nephew Melinda C
with you Nephew George, your Nephew
deny that they or either of them ever made any
threat that they would remove Compt's bill beyond
the jurisdiction of your honorable Court, they deny
that Compt's bill is or ought to be free and they further
state that there is such a record as stated by Compt's
that it is not binding upon them as they were no
parties to it your Nephew deny that a Court of
Chancery has jurisdiction of Compt's bill & they have
plead that your Honor Court has no jurisdiction
of Compt's bill your Nephew having assumed fully
deny all & every allegation in Compt's bill not here

plead that your Honor Court has no jurisdiction
of Compt's bill Your Rpts having answered fully
deny all & every allegation in Compt's bill not here
in admitted require full proof and pray that
Compt's bill be dismissed with Costs &c.

R. Gorin & Rogers P

Anderson on 12 Nov 64

23 5 2000

Wilder

William W. ...

... ..

This day Anderson P. ...
... ..
... ..
... ..
... ..
... ..
... ..
... ..

The deposition of James Cunningham taken
at the law office of Cranshaw & Miller
in the town of Glasgow Ky on Tuesday
the 23rd day of August 1849 pursuant
to a notice thereto annexed to be read
as evidence in behalf of the complainant
in a certain matter of controversy
now depending in the District Circuit
Court on the Chancery side thereof, where
Sally a woman of colour is complainant
and Anderson W. Burtin and others
are defendants and the deposition
being of lawful age and first
duly sworn deposes and says the
deponent by Compt.

Q Are you or not well acquainted
with one and if so state how long you
have known since I came to the possession
of John F. Bowles etc.
A Answer

A I am well acquainted with one and
I have known him in the possession of said Bowles
since the year of about 1819.

Q By whom
A State if you please what my service
was from the year of about 1819 until now, together with
A Answer

A I would not dispute taking the exact
if your having children into the account,
your services would be worth more than
\$20 to \$35 per year, and I think
they were worth that sum.
Q And are you or not acquainted with
A Answer

my children, and, so state whether any of
them ~~services~~ for the last several years have
been able to perform services, and if so
state how many, & what their respective
services have been worth annually.

Answer

I have known your children for a
good many years, indeed I have known
all of them since they were very small
the eldest one of your children to wit Stephen
I think is about 20 years old, & taking into
consideration his raising, I would give it as
my opinion & best belief that after paying
for his raising, that his services up to
the institution of this debt would be worth
about the sum of \$50. The next eldest of
your children is Clara & has here after
deducting her expenses for raising up to
the institution of this debt would in my
opinion be ^{worth} the sum of \$100. Thomas is
the next eldest of your children, and for
the last 4 years of his life before the insti-
tution of this debt I believe his services
would be worth \$15 or \$20 per year
By whom did you or her father have your
debts? Did you say any thing about my being
entitled to any of your debts, and if so state
what it was?

Answer

I have no recollection of hearing him
say any thing about your right to your
debts.
By whom have you heard him say any
thing on your that subject?

I answered I have heard him say, that when I brought in the children he intended giving you your freedom.

Question by Dr. G. B.

From your knowledge of Sella the children, their age, health &c, would you or would you not say that the expenses necessarily incurred in their education would more than counterbalance their services? If, state how much more it was worth to raise them?

Answer.

I should suppose that the services of Sella the children were worth more than the raising, but not much. Sella was about three years in the service of Mr. G. Bowley before she had a child, I think I heard that in the three years she had a child but it died.

By same

You state in answer to a question of Com. that for the last 4 years of the life of Thomas before the institution of this sect, he was worth \$15 or 20 per state whether he was worth any thing after deducting the expenses of raising him and whether or not the expense of raising him was not worth more than his services at the institution of this sect?

Answer.

I should think the expense of raising worth as much as his services.

By same

State whether the other children of Sella Stephen, Relara & Tom, are or are not quite young and yet able to render sufficient services to compensate raising.

Answer. They are young. I have no data that the other children have paid for the raising up to the institution of

I have heard him say that when you
ought to be children he intended to
give you your freedom.

in by Dr. B's.

From your knowledge of Sella she
was then age, health &c, would you or would you
of that the expenses necessarily incurred in their raising
more than counterbalance their services? If so
had much more it was worth to raise them?

I should suppose that the services of Sella she
was worth something more than the raising, but not
to. Sella was about three years in the service of John
by before she had a child living, I think I heard though
in the three years she had a child but it died.

You state in answer to a question of Compt's
in the last 4 years of the life of Thomas before the
institution of this trust, he was worth \$15 or 20 per year,
whether he was worth any thing after deducting
charges of residing &c and whether or not the expenses
of raising them was not worth more than his services up to
institution of this trust?

I should think the expense of raising worth fully
as his services.

State whether the other children of Sella besides
Melara & Tom, are or are not quite young and
able to render sufficient services to compensate for

They are young. I have no idea what the other children
had paid for the raising up to the institution of this trust.

4. Question by Comptroller.

What would the services of Stephen Clara & Tom be worth from the time they were worth any thing up to this time leaving this raising out of the account.

Answer. I think to take into consideration Stephen health that his services would not be worth more than of 200 up to the commencement of this suit. Clara I think would be worth about the same, as to Tom I have answered his former question by gift.

Do you or not know that Peter was ever unhealthily kept?

Answer. I don't know of my own knowledge but I have seen him.

By same. About what sum, as to the tax on Ellen is the Comptroller up to the institution of this suit.

Answer. What the Tax would be I can't say, but to be put into consideration in the estimate of the expense of raising the tax.

Answer.

What the Jury are to do I can't say, but I have
consideration in the estimate of the value of the property, & I say
first I would say that the service of Campbell, in 1780, was
worth more than \$100, over & above all other expenses.
And further this deponent will not

James Cummings

also the deposition of Patrick Worthen is
taken at the same time and place, and to
be read as evidenced in the same case as
mentioned in the Caption hereof, and this depon-
ent being of lawful age and first duly sworn
deposes & saith

Question by Court

State whether or not you were
acquainted with John F. Boules in his life
time

Answer yes Sir I was

5

By Sam

State whether or not you ever heard him say any thing upon the subject of my being entitled to freedom, and if so state what he said & when he said it.

Answer.

I heard him say that you was free born, and to the best of my recollection it was eleven or twelve years ago this winter since he said it.

By Sam

Did or not live upon the farm of said John F. Bowles for some years and was it or not during the time you so lived on his farms that said Bowles had the conversation about named by you

Answer.

I lived upon ~~the~~ a place about a mile from where said Bowles lived and it

and was it or not during the time
you so lived on the farm that said
Bowls had the conversation about
named by you

I lived upon
~~some~~ a place about a mile
from where said Bowls lived and it
was sold to said Bowls, and I remained
upon it some five or six months after
it was sold to him, and during the
time that I so lived upon the same

statement to me, I do not recollect
how long I lived upon the place after
said Bowls bought it.

By same

Were you or not acquainted with
me at the time you lived in the neigh-
borhood of said Bowls, and if so state what
would my services or hire be worth per

Year

Answer

I do not know what your hire would be worth, I do not know how women hired, I suppose you were worth as much as ordinary negro women -

Question by Self,

Are you distinct in Mr. Neall's story that John F. Bowles said that Sella was free born? Or was it or not that when she should have had ten children, he would set her free.

Answer

I heard him say nothing about setting her free. He said she was free born.

By Same

Will you state who were present during the conversation in which John F. Bowles said Sella was free born? and at what place was it?

... was saying about selling her
free. He said she was free born.

By Sam

Will you state who was present during
the conversation in which John H. Bowley said she was
free born? and at what place was it?

Answer

I do not recollect that there was any person
present. It was in his shop.

By Sam

By what is it that you are enabled to recollect
that Bowley said she was free born? And what
induced him to make the remark?

Answer

He was talking about her. We said she
was as free as he was but she would never know
it.

By Sam

In what year was this?

Answer. I do not recollect exactly what year it was
It was 11 or 12 years last Winter.

By same

In what year did you leave Barron County?
And how long has it been since you returned?

Ans.

I left here nine years ago last Christ-
mas, or a few days before Christmas. And returned last
Fall.

By same

Did you or not hear this County very
unfriendly towards John F. Bowler, his Family?

Answer. No Sir, I did not.

By same

Had you or not a personal difficulty with
John F. Bowler, shortly before you left?

Ans.

No Sir, I was in no way
And further this dependent said he not

Patrick J. Washington

My name

Had you or not a personal difficulty with
Mr. S. Boyles shortly before you left?
Ans.

No Sir, I was never in the
And further this defendant saith not

Patrick J. Washington

Barren County etc.

The foregoing deposition of James Cummins & Patrick Wash-
ington read & taken & subscribed & sworn to before me a Justice of
the Peace for the County aforesaid at the time & place & for the purpose
mentioned in the caption. Aug 24. 1842. B. B. Crump J.P.C.

Justice for Clerk to Campbell \$10.00

Shuff do do do 75

Patrick Washington & Crump do do 50

\$22.25
B. B. Crump J.P.C.

The deposition of James G. Hicks taken at the
house of James G. Hicks in the county of Meade
and State of Kentucky on the 25 day of April
1842 agreeably to the notice hereto annexed to be
read as evidence on the part of the complainant
in a suit in Chancery now pending in the Circuit
Court for the County of Barran wherein Sillar or
Silvia (Cauland Luena, Hannah, Stephen, Strata,
Franklin Joseph & Hearty persons of Color
severally are the complainants and Anderson
H. Boles & others are defendants jointly the
deponent being of lawful age and first
Duly sworn deposeth and saith

That he State if you please whether or not
you were acquainted in the State of Virginia with
a colored woman by the name of Minna who
was held as a slave by Elizabeth Mauden Howard
and who some 30 years ago instituted a suit
against said Howard for the freedom of herself
and children.
Ans I was acquainted with the woman Minna
about the year 1813 or 1814.

Q Is or not the girl Sillar or Silvia that was
sold by you and George Hicks to John
G. Hawks late of Barran County Kentucky
a daughter of the said Minna
Ans she was said to be the daughter of S^r
Minna but I do not know it to be so only from
information
Q Did you or not bring the said girl from the
State of Virginia to Kentucky before the suit
which was instituted by the said Minna was
decided

And not knowing when the suit commenced or terminated,
I cannot ^{say} whether or not. But I brought the girl from the
State of Virginia in the year 1844 to the State of Tennessee
to the State of Kentucky.
L. H. Mas as was not said Maria the defendant
of an Indian female who was free

And I cannot tell

And did you or did you not inform John S.
Hawley at the time of the sale made to him
of Lillian that she was free

And I have no knowledge of having told him
so or that I had received the information any
self when the sale took place.

And further this deponent doth not
Jas. G. Hicks

Deposition of James G. Hicks taken at the
house of James G. Hicks

The foregoing deposition of James G. Hicks was
this day taken subscribed and sworn to by the
said James G. Hicks before the under signed a
Justice of the Peace for Meigs County Ky
at the time and place and for the purpose
stated in the caption these of Given
under my hand as Justice of the Peace
for said county this 25th day of April
1842

J. G. Denton

Justices fee \$1.00
Sub J. H. H. H.