

Samuel Abbot

vs

Sally Fenwick

and the said Samuel by Gage
his attorney complains and defends the force and injury
whereto and says that he is not guilty of the
several supposed trespasses above said to his
charge, in manner and form as in the said
declaration is alleged and of this he puts
himself upon the country to Gage for deff^r

and for further plea in this behalf as to the making
the said assault on the said plaintiff and the beating
wounding and imprisonment for the said space of
time in the said declaration mentioned, the said
Samuel says, that the said plaintiff might not
to have a maintenance her aforesaid action thereof
against him because he says because he says
that the said plaintiff before and at the time
when she in the said declaration mentioned was the
servant of him the said defendant, and as such
bound faithfully to serve him the said defendant,
and the said defendant further saith, that the
said plaintiff just before the said time when she
in the said declaration mentioned, neglected her duty
as ^{his} servant as aforesaid, in and about the business
of him the said defendant, and behaved and
conducted herself in a disorderly, saucy, contumacious
and improper manner toward the said defendant
and then and there contrary to the obedience due
to the said defendant, resisted and refused to obey

the lawful commands of him the said defendant
whereupon the said defendant, then and there did
moderately chastise and correct the said the said
Plaintiff for her neglect of duty, disobedience, and
misconduct, and also doing did necessarily and una-
voidably a little beat him, and all that the said
Plaintiff and imprison her for the space of time
in the said declaration mentioned as was lawful
for him to do for the cause aforesaid, which are the
same supposed he said in the said declaration
mentioned. And thus the said defendant is
ready to verify, wherefore he prays judgment of the
said plaintiff ought to have or maintain her
aforesaid action thereof against him. &c

Griffith for Deft

and for further plea in this behalf the said
defendant says that the said plaintiff ought not
to have or maintain her aforesaid action thereof against
him the said defendant because he says that the
said plaintiff at the time when he in the decla-
ration mentioned, was and still is a slave, and
not-free as in the said declaration is supposed, and
thus he is ready to verify - wherefore he prays
judgment of the said plaintiff ought to have and
maintain her aforesaid action thereof against him.

Griffith for Deft,

and for further plea in this behalf the said defendant
says, that the said plaintiff ought not to have or maintain
her aforesaid action thereof against him. &c

because he says, that the said plaintiff at the
time wherein in the declaration mentioned, was
and still is the slave of the said defendant -
and this he is ready to verify, wherefore he prays
judgment if the said plaintiff ought to have or
maintain here aforesaid action thrust against
him &c.

G. J. for def^t

Albert
and
Lena } Plans

Paris Oct 17 1822
A. G. Hancock

L. M. Frank

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General Abbot

Rep. to

Jan 24 6th 1834
General Abbot

And the said Lethe saith that by reason of anything
by the said Abbot in his said second plea above
alleged she ought not to be barred from having
and maintaining her aforesaid action thereof a-
gainst him, because she saith that the said plea
and the matters therein contained in manner
and form as the same are above stated and set forth
are not sufficient in law for the said to bar
the said Lethe from having and maintaining
her aforesaid action thereof against him, and
she is not bound by the Law of the Land
to answer the same, and that she is ready
to verify wherefore for want of a sufficient
plea in this behalf, the said Lethe prayeth
judgment and her damages &c

Cozlet for
J. H.

and as to the said third plea of the said Abbot
the said Lethe saith that she by reason of
anything by the said Abbot in that plea
above alleged ought not to be barred from
having and maintaining her aforesaid
action thereof against him, because she
saith that he the said Abbot at the said
time when &c. of his own wrong and without the
cause by him in his said third plea alleged
assaulted beat and wounded the said Lethe
and imprisoned her and restrained her of her

liberty and held her in servitude in manner
and form as the said Lethe hath above these
complained against him, and this she prays
may be inquired of by the country &

Cogent
for piff

and as to the said fourth plea of the said
Abbot the said Lethe saith that by reason
of anything by the said Abbot is that
plea alleged she ought not to be barred from
having or maintaining her action and
action thereof against him, because she
saith that the said Abbot at the said time when
she of his own wrong and without the cause
tried him in his said fourth plea alleged
assaulted beat and wounded her, and restrained
her of her liberty and held her in servitude
in manner and form as the hath
above. And she complains against
him, and this she prays may be inquired
of by the country &

Cogent
for piff