

to the honourable John Latham Judge of the  
Parish of Natchitoches

The Petition of Betsy a Cherokee Indian  
by birth and legally entitled to her freedom to  
shew That she together with her three children  
are unjustly held in slavery by a certain  
Lewis Latham

prays that the said Lewis Latham be cited  
before your honor in fifteen days from  
the force hereof and condemned by a jury  
to pay the said sum or so much as  
an enlightened jury of the  
may award That her freedom be decreed  
& that she have such other & further  
relief in the Premises as is consistent  
with justice

that she may be put out of the reach  
of the Process of your honourable Court  
or that she may suffer some personal  
injury pending this suit. He therefore  
annexes an Affidavit of probable cause  
of action in this case & prays that a  
judicial guardian be appointed for  
her and her children until this suit be decided

J. L. Latham  
Att. for Plff.

1812

clerk fees

Applying for Commission  
to take the Exam of  
Notary Public

July 1813. Com.  
Nov. 1813. Com.  
Mar. 1814. Com.

Dismissed

John Latham

Sub a. Summons  
as required adu. noti  
fication thereof be g  
ven the Defendant  
March 25/1812

J. P. D.

Ordered that the Petition  
be taken by the Sheriff  
in his then office

Territory of Orleans  
Parish of Natchitoches

Before me John L. Pettit  
judge of the Parish aforesaid appearing  
John L. Pettit who being duly sworn  
according to Law declares that Betty  
Cherokee Indian at present held in  
slavery by Lewis Latham is as  
aforesaid believed entitled to be set  
down as also her three children

Wm L. Subscribed  
this 25<sup>th</sup> March 1812

John L. Pettit

Leulibarr J. J. R.

Betsy a Black Woman  
& her three children  
vs  
Lewis Latham

In the parish Court of Natchitoches  
in the Territory of Orleans.  
Petition for the freedom of the  
plaintiffs

To the honorable John C. Case Judge of the parish of  
Natchitoches.

The petition of Lewis Latham of said parish  
with due respect represents to your honor.

That John Abernethie, Ezekiel Able, John  
Callaway John Byrd, Benjamin Pettit, and  
Matthews all of the Territory of upper  
Louisiana are material witnesses for him in the above  
cause and that he cannot safely go to trial in the  
said cause without their evidence.

Your petitioners therefore pray that  
a de duces protestation issue from your honorable  
Court to take the depositions of the said John  
Abernethie, Ezekiel Able, John Callaway, John  
Byrd, Benjamin Pettit, and Matthews  
before Enoch Evans esq. according to Law.

And your predecessors in duty bound shall  
ever pray You. Lewis Latham

Parish of Natchitoches  
Territory of Orleans

Before me John C. Carr Judge of the  
Parish of Natchitoches personally appeared  
the above named Lewis Latham who made  
oath that John Abernethie, Ezekiel Able  
John Callaway John Byrd, Moses Canest  
Benjamin Pettit and Mathewes are  
natural witnesses for him on the trial of the  
above cause that they and each of them  
reside out of the Jurisdiction of the Territory  
of Orleans and of the honorable court.

That he cannot safely go to trial in the said  
cause without the testimony of the said  
John Abernethie, Ezekiel Able, John Callaway  
John Byrd, Moses Canest, Benjamin Pettit  
and Mathewes. Lewis Latham

Sworn and subscribed before me this  
19<sup>th</sup> day of May 1812.

J. C. Carr J. P.

800 70.

Richard & Joseph  
Pet. for Div. Va.  
Latham

Let us Beddison Poleson  
and as required & due  
prosecution of them &  
have of taking before  
in given full.  
John Lebar  
J. P. L.

Dismissed June 18<sup>th</sup> 1812

Betty Mulat<sup>re</sup>

Jan<sup>y</sup> 27<sup>th</sup> 1844.

Lewis Latham.

We, whose names are hereto subscribed, do agree that the following interrogatories shall be answered & sworn to before James Bludworth Esq<sup>r</sup> by him returned to the next District Court, then to be read in evidence in the above suit.

Lewis Latham

J. M. Latham

Interrogatories by Defendant, put to Daniel Latham Esq<sup>r</sup>.

1<sup>st</sup> Do you or do you not know the mulat<sup>re</sup> Betty, the plaintiff in this suit?

as  
one I can

2<sup>nd</sup> How long have you known her & where did you know her first?

3<sup>rd</sup> Was or was not the said Betty & her children considered & held as slaves at the time you first knew them & who was their owner?

4<sup>th</sup> Do you or do you not know about the time when this Defendant came to the possession of the said Betty & her children, & when & where was it?

5<sup>th</sup> Do you or do you not know that prior to the time when this Defendant purchased the said Betty & her children, she the said Betty & her children were sold by William Crawford to Robert Crawford, for a valuable consideration?

6<sup>th</sup> Was or was not the said Betty & her children always considered slaves, from your first knowledge of them?

7<sup>th</sup> Please to state any thing more which you may know relative to the matter in dispute, which may not be embraced by one of the foregoing interrogatories?

12th *Mulattre*

*Lewis Latham* interrogatories by Defendant answered by Daniel McMill -

1st Interrogatory - I do.

2nd I know her on St. Francis river first, in October 1810.

3rd They were considered as much slaves as any other slaves. They belonged at that time to William Crawford.

4th It was in the fall of 1811.

5th I do know that she was sold by William Crawford to Robert Crawford - I believe for a valuable consideration.

6th They were.

7th I know nothing more than I have stated.

Interrogatories by plaintiff answered by Daniel McMill -

1st I did not know her mother.

2nd About thirty years.

3rd I was not.

January 26th 1814 - Daniel McMill this day appeared before me & made oath that the foregoing answers to the annexed interrogatories are true.

sworn to & subscribed

before me this date

above - James H. H. H.

*Daniel McMill*

Interrogatory by Defendant - answered by Mary McMill -

1st I know her very well.



- 2<sup>d</sup> I knew her first in the District of Genesee, I think, in the year 1810.
- 3<sup>d</sup> They were always considered as slaves. I knew them well - they belonged to William Crawford. I never heard it mentioned that Betty & her children were entitled to their freedom - until after I came here.
- 4<sup>th</sup> I think it was in October 1814 - I do not know whether Mr. Latham purchased them at St. Michael or Cape Girardeau.
- 5<sup>th</sup> Not long before Mr. Latham bought Betty & her children, they were sold by William Crawford to Robert Crawford, for a pretty valuable plantation.
- 6<sup>th</sup> They were always considered & treated as slaves & I never heard to the contrary before I came here.
- 7<sup>th</sup> I know nothing more.

Interrogatories by plaintiff:

- 1<sup>st</sup> I do not know her mother.
- 2<sup>d</sup> Upwards of thirty I suppose.
- 3<sup>d</sup> I was not present at either of the sales - January 26<sup>th</sup> 1814 - This day personally before the undersigned appeared Mary McKinn, who being sworn, saith that the foregoing answers to the annexed interrogatories are true.

James McKinn  
 Stephen McKinn  
 I came to and subscribed before me this 28<sup>th</sup> January 1814  
 James McKinn  
 Mary McKinn  
 mark

I have had  
 Cross Interrogatories served on the Plaintiff  
 and he has answered the motion of the Plaintiff  
 If you are not the Plaintiff to the best  
 of your belief at the time you were  
 present at the sale of the  
 Plaintiff from or to any individual

*Dr. Krumm*  
*Atto per 1124*

Genevieve,

vs. I know

him Crawford

Betty & her

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How  
her first

Betty Mullatree  
vs  
Lewis Lathan

Interrogator put to  
Daniel M. Neal &  
Mary M. Neal

District Court. 1st District  
March Term 1846

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