

Rachel v Draper.

Be it remembered that upon the trial of this cause the plt offered to introduce a record which record is in the words & figures following to wit, "Virginia to wit" (Take it in) as evidence to prove that the Rachel named therein was free at the time of instituting this suit for freedom. ~~The Counsel for the deft~~ and moved the court to instruct the jury that the said Record was admissible evidence in the present suit ~~between the~~ to establish the fact that the Rachel named in the said record was free on the day of instituting her said suit, & that if they should believe this Rachel therein named to be the same ~~Rachel~~ person with the plaintiff, it was admissible evidence in this cause to prove that the plt ~~was free~~ is free; notwithstanding no privity of title or interest can be shewn between the present deft & the deft named in this said Record-~~and~~ nor any combination can be shewn between them. And notwithstanding the present deft may shew title, or claim under, a different person & by antecedent right.

Peter Randolph (seal)