

Rachel v Draper

Be it remembered that upon the  
trial of this cause the pl<sup>t</sup> offered to intro-  
duce 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 court ~~of~~  
~~the~~ <sup>and</sup> moved the court to instruct the  
jury that the said Record was admissible  
evidence in the present suit ~~between~~ <sup>to establish</sup>  
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  
the Rachel therein named to be the same  
Rachel person with the plaintiff, it was admissible  
evidence <sup>in this cause to prove</sup> that the pl<sup>t</sup> was free; <sup>is free;</sup>  
notwithstanding no pivity of title or interest

can be shown between the present  
debt & the debt named in this said  
Record - ~~and~~ <sup>nor</sup> any combination can  
be shown between them. And not  
withstanding the present debt may  
show title, or claim under, a  
different person & by antecedent  
right.

Peter Randolph *CR*