. . . . Rogers visited the Decd on Feb. 16. at 9 o'clock, in the morning when she was dyeing, appeard insensible, & had a rattling in her throat. She dew Decd. Monday & Tuesday. Feb. 17, & 18. found her totally insensible —

Mrs Knapp appears to have been the Negotiator of this Will, & to have set the Decd to Sale, as a Security for her Debt.

Mr Woodward, the Exor, appears to have been in Gaol for Debt; he took the Benefit of the Insolvent Act, & is now a Fleet Prisoner at large — He was likewise very instrumental in procuring the Will; he went about the Streets begging Persons to be Witnesses thereto —

The Will itself is Superaburdantly attested; by 4 Wts — The Variation in the name of one of those Witnesses, viz. Coint, who is also called Cosnett. The Reluctance of Coint to be a subscribing Wt. The Averseness of the Opponents to examine this Wt.

The Will itself being unnatural — the palpable Mistake therein, by Decd with respect to her own Family, viz. She bequeaths a legacy to Wm Sanders, & to each of his Children, whereas he had never had a child, had been married only 2 Years, & had wrote to acquaint his Grandmother of his Marriage — (N. Sanders' Wife had 3 Children by her first Husband.)

NB

Most of the Witnesses examined by Woodward have legacies NB only 3 Wts Mrs Knapp, Pocket, & Mr Hales, who have all been paid before their Examination, & given Releases to Woodward

NB Pocket says nothing of this Conversation in her Depon

Rogers says, that Pocket (who sat up with Decd, on Saturday night) hearing her ask Decd, if she knew what she had done; said, dont talk to her, for; Poor Soul, she is not fit to be talked to, nor have I spoke to her all night, for she dont understand us.

Hand. says, that no Person had a Seal, Herbert Shaw took a Button out of his Sleeve, which being put on the Wax, Ann Ward took it off, & then published & declared the Paper to be her last Will — to 5 Int. that Decd was a stranger to him; he never saw her before the Day of the Date of the Will —

Dr

Q. The Words of 4 Int. are. What must become of me, if I give all away

6 Int. denies Decd expressd herself as interrogate when asked to sign, & that Woodward said, "Oh Madam, you shall never want. I'll take care of you" — that 5 or 6 Minutes after the Execution of the Will Ann Ward complaining she wanted money, to pay her Washerwoman, asked Woodward to lend her Some, who lent her 2 Guineas, wch he borrowed from Respondent

10 & 12 Int. Heard Woodward say, he was related to Decd, but not in what degree; never knew, he troubled himself about Decd, till after Qs death, nor believes he wd have taken any notice of her, if he had not heard, her Sister had died very rich, & that her fortune wd come to the Decd; except y Common Civilities he wd have shewn her from his former Acquaintances with her —

Mary Hales on Decds application to Woodward for releif before making to 5 Int. — } the Will, he answerd "Madam you shall never want for any
on 2 Cond. } Assistance in my Power, I will take care of you"; & immediately gave Orders to y Woman of the House accordingly . . .

Dr in Chief } after Decd executed her Will, before W. left y Room, she told him
to 18 Int. } she owd Money to sev. Persons, & desired him to lend her 2 Guineas which he did; & told her when that was gone she should have more . . . . . .

They are obliged to support a fact wherein their own Characters are concerned, therefore depose in this manner —

The Custody is spoke to by Oliver & Bradley, who asked, but were not allowd to see the Decd — You will observe How angry Hand was with Oliver, when he Heard he was employd about Writing for a Commission, to Mr Bishop at Dr Commons.

You must determine, Sir, from accumulated Presumptions, which when the Variety of minute Circumstances, are laid together form the strongest foundation for you to pronounce that this Will, was obtained, by Imposition & Undue Influence, gained over the mind of a Weak & intemperate Old Woman —

Dr Harris

Having mentioned the Particulars in my Opening, I will observe the Decd was dissatisfied with her Relations; that Woodward assisted her, in her distress, & that she was in her Senses long after the Will was made — The Desertion of her Relations, when she was in necessitous Circumstances produced a Resentment agt them; I will mention the Words of the Persons who speak to those Declarations — 2 Witnesses say, it was not mere dissatisfaction, but Resentment — Quarterly allowd her a small Pittance, but withdrew it a year before her Death; this she imputed to her daur & Grand daur Anne Sanders — Eliz. Sanders to 5 Int. says, Decd sev. times within 6 Mo. of her death told her, she believed her Grand daur Anne S. had been the means of stopping the Annuity — The Evidence on the other Side do not actually contradict this — Rebecca Gould & Eliz. Sanders, speak to Affection in general — Rogers & Eliz. Rowley are the strongest Wt. they say, that within 6 Mo. of her death, she expressd a concern, she cd not send Presents to her Grand children — Wm Sanders says, in a Lre received from Decd in Nov. 1765, she desired him to give her Blessing to his Mother, & tell her, she wished she cd help her — Why was not this Lre exhibited? I dont go so far, as to say, she never had an Affection, the Wt dont say so; but it comes out, that her disaffection arose, from their neglect. I wd confine it to about 6 Mo. before her death, when worked up, she expressd her Anger to every Person who came near her — There is a way to discover wch the Wt speak Truth, by enquiring into the Behavior of the Children to their Grandmother, & the Ones to consider the mean Situation to wch she was reduced; Sanders says, she was supported by her Friends, he dont add Relations, except one of his Sisters who seem ther shewn to be very low, in order to exculpate them for not sending some support to their Gr: Mother; that they were Housekeepers may be collected from Wm Sanders's Letter to his Gr: mother dated Sep. 18. 1762, (wherein he mentions his Supping with his Sister, & that he himself was a Housekeeper) If they were in an extreme low Degree, of life, they wd have given an action pleading it — He is a competent Witness, I will not say he is perjured, but he is not a Credible Witness — If you believe the Decd made the Declarations the Wt mention, you wont suppose agt them — The Letter wrote by Anne is very artfull; that every thing in Ireland is burnt; they want to lull the old Woman to sleep, & conscious of their own Behavior, they wd not only deprive her of Quarters allowance, but of all knowledge of any thing coming to her by her death — If Woodward had not been Exor it was supposed Bradley would, there were no thoughts of the Family; Mr Rogers had contributed to supply y necessities of the Decd, & had some Bias on her mind, as she expected to be Ex. & not being so money, on the Expectation of a Fortune; she had a Right, but that wd not feed or Cloath her — The Witnesses say, that before Woodward saw this Shower of Gold, he had supported the Decd; & when her Children had rendered themselves unworthy of her favor, by their neglect of her, whom did she prefer but Woodward? Dr Matriot made 2 Objections to this Will, viz. Custody, & Incapacity, & produced Oliver & Bradley to support the Charge; I do beleive, considering Mr Bradleys Behavior, it was right to refuse him Admittance; & he had denied Decd Assistance in her Necessities — With respect to the Incapacity, Oliver says absurdly, she had Capacity, to take an Oath, as a Thing of course; what cd be more serious? he must have strange Ideas of Capacity —

I now go to the method of making the Will: there is Evidence of her desire to make it on the Saturday; Woodward asks her who shall make it? she says, Mr Hand; but say the Gentlemen, Mr Hand had never seen her — She gives Hand Instructions with her own mouth; Mr Shaw asked her many Questions, perhaps impertinently, but he corroborates Hands Evidence; Her not knowing what her Substance was, is no like, many of the Clergy at those times; he abbers over a few Prayers — The