

SHELDON DEPOSITION

RUSSELL v. SHELDON

STAC 5/R41/32

November 1584 – November 1585

I. Introduction

This transcription is taken from the original document (6500 words on 128 lines). The document was obtained from the UK National Archives. A copy of this original document is appended to the last page of this section.

The deposition was offered to in response to a complaint filed in Star Chamber by Sheldon’s son-in-law John Russell who was alleging that Sheldon was trying to take his wife away because “for difference between them in causes of religion.” Sheldon defended his daughter Elizabeth and his wife Ann Throckmorton against Russell’s attempts to indict them both as Catholic recusants. A portion of the case was reported by Leslie Hotson in his book, *I, William Shakespeare* (London, Jonathan Cape, 1937); while Hotson was not suggesting that Sheldon was Shakespeare, he did charectarize the incident as providing “ample material” for “clashes between the Montagues and Capulets” (Hotson, p. 34).

This transcription adjusts the original line-by-line transcription to include paragraph spacing, punctuation, and modern spelling (y=i; u=v; j added; modern spelling where does not change the meaning of the word).

The last page appends the original document. It should be noted that the document was one large page, with over 6500 words on 128 lines, and only two notable cross-outs. (Compare the commentary from the First Folio by the players John Heminge and Henrie Condell: “wee have scarce received from him [Shakespeare] a blot in his papers.”)

II. Comparison with Shakespeare Stylometrics

Although there has been no computer analysis of this document, broadly speaking this legal deposition appears a very good match for the Shakespeare

plays in terms of both (A) word usage and (B) original spelling. Each is considered below.

A. Word Usage

In *Shakespeare, Computers, and the Mystery of Authorship* (Cambridge University Press, 2009), Hugh Craig and Arthur F. Kinney introduce their proposed lexicon of Shakespeare words with: “A disputed passage in which some or all of *gentle*, *answer*, and *beseech* occur, and in which there are no instances of *yes*, *brave*, *sure*, and *hopes*, shows an affinity with known Shakespeare” (Craig/Kinney, p. 18). By this standard, the deposition shows an affinity with Shakespeare: while there is no instance of “beseech,” there are 2 instances of “gently” (“gently and friendly entertained” at line 36; “gently entertained” at line 123), with 14 instances of “answer” (or answered), and there is no usage of *yes*, *brave*, *sure*, or *hopes*. Beyond this, there are other important marker words, some measured to be preferred by Shakespeare and others less frequently (or rarely) used by Shakespeare in his plays.

Table 1 below shows the usage of these marker words by Sheldon in his legal deposition. As can be seen, Sheldon’s usage (or non-usage) is consistent with Shakespeare’s word preferences.

Table 1. Sheldon Usage in Deposition of Common Shakespeare Markers

Preferred Shakespeare Word Usage	Non-Preferred Shakespeare Word Usage	Source
Gentle (“gently”) (2 times); answer (14); beseech (0)	Yes (0); brave (0); sure (0); hopes (0)	Hugh Craig and Arthur F. Kinney, <i>Shakespeare, Computers, and the Mystery of Authorship</i> (Cambridge Univ Press, 2009), p. 18: basic test for affinity with Shakespeare word usage.
Hath (27) Doth (5)	Has (0) Does (0)	Craig/Kinney, pp. 34-5, 38-9.
That (used as conjunction)(100)		Craig/Kinney, p. 39.
Most (28)	Much (2)	Craig, “Common-word Frequencies, Shakespeare’s Style, and the <i>Elegy</i> by W.S.,”

Preferred Shakespeare Word Usage	Non-Preferred Shakespeare Word Usage	Source
		<i>Early Modern Literary Studies</i> 8.1 (May 2002): commenting on “most” as an important “serviceable” common-word marker of Shakespeare. Also Ward E.Y. Elliott and Robert J. Valenza, “And Then There Were None: Winnowing the Shakespeare Claimants,” <i>Computers and the Humanities</i> , vol. 30, no. 3 (1996), pp. 191-235, at 201.
	Ye (0) Contractions (0)	Elliott/Valenza, pp. 196, 199. Also Craig/Kinney, p. 35.
You (13); I (4); he (36); your (1); she (4); it (17)	Thy (0); thou (0); thee (0); we (0); they (7)	Elliott/Valenza, p. 196.
Good (9); better (5)	Best (0)	Elliott/Valenza, p. 196.
Where-compound words such as whereof (23); there-compound words such as therein (41)		Elliott/Valenza, p. 200.
	Ours (0); hers (0); ought (0); tonight (0); couldst (0); darest (0); us (0); methought (0); theirs (0); mightst (0); its (0); beest (0); sire (0); ours (0); ourself (0); up (as preposition) (0); dared (0); selves (0); methought (0); mought (0); mine (as noun) (0); mowe (0); oughtst (0); wolfe (0)	Craig, “Common-words,” Table 3.

B. Original Spelling

The text spelling below has been almost completely modernized; however, the spelling in the original document is very different from the modern spelling. As an example of the original spelling, the first five lines of the document are set forth in their original spelling:

- (1) The said Defendt sayth that he veryly thincketh that the said bill of complaynt against him, exhybyted in this honorable courte, is in the most materyall pts thereof false, untrue, and insuffycient in the lawe to be answered unto, for dyvers manyfest and apparant causes therein contayned, and the
- (2) matters thereof devysed and ymagyned of purpose only to put this defendt to moore vexacyon, trovble, and expences in the lawe without any suche iuste cause, as by the said bill ys pretended.

All advanntage to the insuffycientcy of w^{ch} said byll to this defendt saved he, this defendt,

- (3) for answeare to suche of the matters as do concerne the said defendt: sayeth fyrst tovching the pl's allegacions that this defendant hath been vowed & addicted to papishcall Religion, and that this defendt hath been a geve of counteyance unto Recusants & knowen adversaryes to religion established.
- (4) This defendt thincketh that to these (& suche lyke generall (& uncertayne sclaunders tovching these or lyke matters he this Sefendt shall not be inforced to answeare [and herein doth refer himself to the consyderacyon of this honorable court whether he shalbe enforced to answeare] the same therein: for that this Defendt thincketh the matters tovching the same are suche as this honorable courte seldome or never heareth or
- (5) determyneth, especyally whan the same ys so enterlaced with pryvate matters as in the same bill of complaynt the same are ymportynently inserted.

Arguing for the similarity of the Hand D in the Sir Thomas More play to Shakespeare, the editor J. Dover Wilson catalogued the large numbers of “old-fashioned” spellings in Shakespeare, spellings he said were “unusual forms for the writers of the period.” (See Craig/Kinney, p. 139, quoting Wilson; also see “Frequently Asked Questions” in this website, number 4, on Shakespeare as an older man, with full discussion of Wilson’s findings.)

Although Wilson originally focused on the rare spelling “scilens” for “silence” (‘sc’ for ‘s’), he had a long list of variable spellings from the quartos. While there is no spelling “scilens” in the deposition, there is a (somewhat) similar variable spelling: line 4, “sclaunder” for “slander” (although the “sc” in “sclaunder” may have sounded like a ‘k’). There are, however, other noticeable similarities between Wilson’s list and the deposition. For example, ‘c’ and ‘t’ interchangeable before -ion: see line 2, “vexacyon”, see line 4, “consyderacyn”; ‘ck’ for ‘k’ after ‘n’: see line 1 & 4, “thincketh”; ‘a’ for ‘e’: line 1, “apparent”; the use of ‘w^{ch}’ for ‘which’: see “w^{ch}” in line 2.

III. Modern Text Transcription

NOTE: This text transcription indicates the number of each line of the text from the original document. Following the transcription is the original document received from the UK National Archives. This is the document from which the transcription was made by the author.

[line 1] The said defendant sayth that he verily thinketh that the said bill of complaint against him, exhibited in this honorable courte, is in the most material parts thereof false, untrue, and insufficient in the law to be answered unto, for diverse, manifest, and apparent causes therein contained; and the [line 2] matters thereof devised and imagined of purpose only to put this defendant to more vexacion, trouble, and expenses in the law without any such just cause, as by the said bill is pretended.

All advantage to the insufficiency of which said bill to this defendant saved he, this defendant, [line 3] for answer to such of the matters as do concern the said

defendant: sayeth first touching the pl's allegations that this defendant hath been vowed & addicted to papishcall Religion, and that this defendant hath been a giver of countenance unto Recusants and known adversaries to religion established.

[line 4] This defendant thinketh that to these and such like general and uncertain slanders touching these or like matters he this defendant shall not be enforced to answer [and herein doth refer himself to the consideration of this honorable court whether he shall be enforced to answer] the same therein: for that this defendant thinketh the matters touching the same are such as this honorable courte seldom or never heareth or [line 5] determineth, especially when the same is so interlaced with private matters as in the same bill of complaint the same are importently inserted.

Nevertheless for some declaration and satisfaction to this honorable court, and those which shall see or hear this defendant's answer touching this [line 6] defendant's duty and allegiances to the Queen's most excellent majesty, this defendant sayth that since the said defendant did make his submission unto the honorable Lords of her majesty's privy council, he the said defendant hath in all things (to his knowledge) dutyfully and most faithfully performed his dutys [line 7] and alleageance according to the said submission, and in his conscience thinketh the same to be well known to the said complainant, for that in the persons of the

sayd complainant he the said defendant since hath dutyfully accomplished the same.

And whereas the said complainant in the said bill pretendeth that [line 8] this defendant sought to separate the said complainants wife from him, and that for the difference between them in causes of Religion: this defendant sayeth that the said complainant hath often showed himself, long before the time of separation in the bill specified, by speeches delivered by the said complainant to the said [line 9] defendant and to divers other persons, and by many other circumstances, to dislike and conceive displeasure against his said wife for other causes too tedious to be herein inserted, and as this defendant taketh it, unfit to trouble this honorable court withal. And the said complainant hath, many times before the time of [line 10] separation in the bill specified, used vile and evil means to his said wife, as well by shutting and locking her up and restraining her of her liberty, and by taking and removing from her such necessary persons as were both comfortable and serviceable unto her, and in place of them appointed others, who [line 11] as it was thought, were very lewd and badly disposed persons; and hath most cruelly, unmanly, and barbarously beaten and stricken her (as it hath been constantly affirmed) thinking thereby to make her weary of her life and to compel her to be willing to depart without any allowance at all for [line 12] her maintenance, or at the least, with a very small portion.

And likewise long before the time of separation in the bill alleged, the complainant sent her home to the house of the said defendant in most vile and despiteful manner without the consent of the sayd defendant, and (as the said defendant thinketh) against the [line 13] will and liking of his said wife: whereupon complaint was made by the said defendant unto her majesty's council in the Marches of Wales, which thereupon after long and deliberate hearing thereof by consent of the said complainant, did set down an order for the good usage and intreaty of his sayd wife who [line 14] was by the same order to be sent for to the house of the now defendant, and from thence to be brought by the means of one Richard Lygon, Esquire deceased, to the house of the complainant.

The which was not performed by the means of the said complainant, by reason whereof. And by the unreverent usage of the said complainant [line 15] towards her majesty's said council, information was given by the said council unto some of the Lords of her highness's most honorable privy council, whereupon means was not only made on behalf of the said complainant to stay the said defendant from prosecuting the said complainant by way of suit: [line 16] where as otherwise this defendant thinketh the said complainant should have received condign punishment for his contemptuous and unreverent breach of the aforesaid order of her majesty's council in the Marches of Wales.

But also the said defendant, upon the said means used, was contented for his said [line 17] daughter's quietness to have a full end to be made between the said complainant and the said defendant, and that a convenient portion should be affirmed for the maintenance of the complainant's said wife which end and portion aforesaid appointed were made and set down by the Right Honorable Lord Chancellor of [line 18] England and Sir William Cordell knight deceased then Master of the Rules.

And therefore this defendant marveleth [line 19] that the said complainant can so impudently affirm that matter of Religion was the cause of the severance of the complainant and his said wife when it as well known that the said complainant and his wife were married by a minister according to her majesty's laws. And this defendant hath credibly heard that the said complainant's wife after the aforesaid marriage did many times accompany the said complainant at service and publicly prays according to her majesty's laws, said in his [line 20] house at Strensham.

And whereas the said complainant importantly surmiseth, that secret masses were continually used in the house of the said defendant, and also brought to the house of the said complainant in the time of his absence beyond the seas: this defendant thinketh that the complainant thereby sheweth his malice [line 21] very apparently for that whereas he did about three years now past absence, which time

hit hath been reported that there was apprehended by the sayd complainant an old priest, with whom after the said complainant had conference (the said complainant seeking, as it is thought to shadow his practice and malicious intent) [line 22] caused the sayd old priest to be brought before the now Right Honorable the Lord Archbishop of Canterbury, then being Bishop of Worcester, and before whom it was sayed he had confessed he had said mass at Strensham by the procurement of Anne, the wife of the said defendant: whereupon advertisement was given [line 23] to the Right Honorable the Lords of her highness's privy council, and by their honors's direction to the sayd Lord Archbishop, the sayd Lord Archbishop was also required to examine the fate of that matter, which was effectually done.

And yet the said complainant's malice was not satisfied by these proceedings; [line 24] for after that time the said complainant (as the said defendant hath been credibly informed) to show further his wicked malice against the said defendant and the wife of this defendant and also against the said complainant's own wife by all the means he could, did assay and attempt at diverse Quarter Sessions and assises held [line 25] in the county of Worcester, to indict the wife of the said defendant and Elizabeth the wife of the said complainant: which by no means he could bring to pass (as this defendant thinketh) whether the County gave little credit unto his information, noting (as it may be thought) his extreme malice [line 26] or whether it were defect of good and sufficient matter.

And for further proof that the said complainant desired the said separation of the said complainant from his wife, about Easter last past, this defendant sayeth, that about the xxiii of March last, one Rowland Baugh, gent, did come to this defendant with Letters [line 27] from him the said complainant as sent by the said complainant, wherein the complainant in effect requested a separation betwixte him and his said wife, with an offer therein of a convenient portion for her maintenance, showing that he thought the same meetest for them both. And by the said Rowland Baugh made means [line 28] that the said yearly allowanncce or portion might be reduced to some reasonable rate, for that this complainant sayed he meant to be good to his children, who should be no further charge or burthen to his wife their mother than she should thinke good of: upon which said complainant's Letters and by the mediation of the said Rowland Baugh [line 29] there ensued an agreement for a separation and portion to be allowed for the complainant's said wife's maintenance.

And for a final end therein, one Robert Harper, this defendant's servant in the bill mentioned, and one Nicholas Follyate servant likewise unto this defendant, were sent unto the complainant's house at Strensham the said week before [line 30] Easter last past in the bill mentioned with the books for the said yearly allowance and portion engrossed, to the intent the complainant should seal and deliver the same in due form of law: upon which said Harper and Follyate then and thither

coming with the said Rowland Baugh and showing of the said books to the sayd [line 31] complainant.

The said complainant after perusing thereof (as the said Harper informed the now defendant) thereupon misliked the same, for that therein was 30 pounds portion by the year more than he the said complainant would assent to give, and yet was all of hit less than the yearly sent of one hundred marks which the said [line 32] complainant in his said bill pretendeth that he hath allowed his said wife: whereupon the sayd Harper and Follyate departed. And afterwards the sayd Harper and Follyate being by the complainant's procurement sent for back again, upon the morrow being Wednesday came to Strensham aforesaid where the [line 33] said assurance was sealed by the said complainant.

Whereupon the said Harper & Follyatt being ready to depart from thence, having given no reason of offense to the said complainant (to this defendant's knowledge) the said complainant (as this defendant was told by the said Harper) used then unseemly words [line 34] to Harper aforesaid, against Harper and this defendant, and threatened to fight with him and this defendant. And being wished to be better advised than to quarrel with this defendant, the said complainant (as this defendant hath heard) in most furious manner replied to this effect that he would fight [line 35] with the said defendant, with Edward Sheldon the defendant

his son and heir apparent, and Francis Clare esquire, this defendant's son-in-law by marriage, and that shortly after he the said complainant would send to challenge them all.

And further this defendant sayeth that on the said Tuesday in the Easter week, in the [line 36] said bill mentioned, the said Francis Clynton in the bill specified came to Beoley aforesaid about twelve of the clock the same day (the said defendant with others his friends then being at dinner) where the said defendant and others his friends and servants gently and friendly entertained him. And this defendant [line 37] did demand of him whether he would please to sit down to dinner, when he answered, "No"; whereupon the said Clynton was requested to go into the buttery there to dine by himself, which the said Clynton likewise refused, whereupon some one of the defendant's friends rose from the table [line 38] and accompanied him in most friendly manner into the said defendant's garden at Beoley aforesaid, praying him (as this defendant is informed) to go and eat some meat, to whom he answered that he would neither eat nor drink before he had delivered his message to Mr Sheldon, meaning this defendant.

[line 39] Immediately after dinner aforesaid, this defendant, calling to mind the unseemly speeches and words of challenge used by the said complainant to the

foresaid Harper, and thinking the said Clynton's coming was to make the said challenge with this defendant, thereupon the said defendant requested Robert Acton, Francis Clare, [line 40] and George Skynner esquire, there present at aforesaid, to accompany the said defendant, and to hear such words as the said Clynton should use to the said defendant. And upon the meeting of the said defendant and the said Clynton in the garden, the said Clynton demanded of the said defendant whether he might [line 41] speak with the said defendant alone or privately, to which the said defendant answered to this effect (as the now defendant remembreth), "No, for that you, Mr Clynton, are to me a stranger, and a man with whom I have had small acquaintance. And I think you be come from such a one [meaning the complainant] to offer unto me some quarrel [line 42] to the breach of the peace or villainy, which I intend not to receive here in my own house; but do require you, pray you, and charge you, even for you own safety, not to open your mouth to my offence. For [this defendant said] if you do, I will forget humanity and civility, and so use you as the basest person in this [line 43] house shall tread upon you."

And with all further said to this effect, that if the said Clynton had either wit, discretion or honesty he would not have taken such a matter in hand, to disquiet a gentleman so much his better in his own house. And further said to this effect, whatsoever the complainant will offer "to [line 44] me himself I will answer it."

And further the said defendant said then to this effect, that the said defendant was “no hydden man” but such a one as the said complainant might find at all times, for that his occasions were to follow his business, namely on Monday following to Abberton in his way to Abbot’s Wood and [line 45] Bucknell Wood, where there was some matters in question about words between this gentleman, signifying the said Frances Clare and him the said defendant, and that he would that night lie at Wadborough at the house of William Sheldon, Esquire, brother to the said defendant. And on the morrow proposed to be at the [line 46] Quarter Sessions, and so from thence to follow his business to London or other such or like words to the same effect were uttered by the said defendant.

And whereas the said complainant surmiseth that this defendant and divers others to the number of threescore persons were assembled in [line 47] warlike and riotous manner arrayed and weaponed at or near the complainant’s wood called Harwell and the said defendant sayeth (to his remembrance) neither this defendant, nor any or his company, were in or upon the said wood called Harwell. But this defendant, and some others much fewer than threescore [line 48] were in and upon the said woods called Bucknell about the question above mentioned (?????????) defendant and the rest there being with him usually do go, the said complainant and others did come and assault this defendant and others. And this defendant then

having a byrding [line 49] piece in his hands which he usually carryeth, and did use all the means he could to keep her majestie's peace, (?????) from hurt.

And where the said complainant did doth greivously enforce, that the said defendant having gathered his uttermost power and force out diverse counties came [line 50] to the City of Worcester the xxth day of April, in the bill specified with the number of three hundred persons at most (???????). The said defendant sayeth, that to his remembrance there were not in his company any others than such as were or be his kinsmen or alliesmen, or kin or allied [line 51] to his said kinsmen, neither (to his knowledge) were there any servant men but such as were his own serving men or servants unto such kinsmen or alliesmen as before are mentioned; and that many of them came to the Sessions, either bound in duty or in respect of her majesty's service, about their [line 52] private affairs, or to attend and do their duties in and upon their said masters.

And that the most of them were not gathered or assembled together by this defendant, but some met or overtook him and his company by chance, some hearing of the complainant's threatenings against this defendant [line 53] did repair to this defendant: for this defendant was credibly advertised that the complainant, being desired (?????) to come in peaceable manner and without any extraordinary great number, did utter and declare that he would come with what force & number

he could, to be [line 54] revenged of the said defendant. And also this defendant hath had intelligence that the complainant was accompanied with the number of ____#____ or ____#____ footemen and horsemen or thereabouts and that the said complainant had declared unto the bailiff and officers of the said City that his coming was to be revenged upon this now defendant and he would be revenged upon the now defendant. [line 55] And that therefore the complainant prayed the said bailiff that he might either enter into the said City, or pass by the said City and to meet the said defendant in coming on the highway to the said City.

Whereof the now defendant hearing and so meaning to prevent his said malicious intent the said defendant [line 56] with his company rode out of the nearest and ordinariest highway, one mile and more to another gate entering onto the said City, where he entered into the said City in peaceable manner, with the good contentacion of the said bailiff and officers (as this defendant thinketh).

And whereas the complainant pretended [line 57] that the defendant came with a malicious mind of revenge towards the complainant with an intention to breach (then at the said Sessions) the peace, and to commit outrageous acts upon the complainant, the said defendant sayeth, that he the said defendant (if he had so intended) might easily have executed his mind of [line 58] revenge at the meeting _____ at the said Bucknell Wood with ____ violence (??????). At such time as

the said complainant most willfully assaulted the said defendant, being in the defendant's own possession called Bucknell Wood where the said defendant had the said [line 59] complainant & his company in effect at his mercy and devotion to which said Bucknell Wood the said defendant came upon his necessary business and affairs (as is aforesaid), the which violence this defendant did not only forebear to do, respecting the offense to God, his duty to the Queen's most excellent majestie [line 60] the avoidance of murder, or else at the least blood fall. But also then was the _protection and defense of the said complainant and his company, albeit the complainant then and there assaulted the said defendant with some peril and danger to him this defendant & his brother William Sheldon then there [line 61] accompanying this defendant.

All which the said defendant thinketh this complainant cannot (?????) deny especially when so many witnesses of good and sufficient credit will be ready to verify the said defendant his sayings herein, and the said defendant's meaning [line 62] the assault and outrage made then at the said Wood by the said complainant and his company upon the said defendant, and thinking that the said complainant wholly endeavored the spoil and destruction of the said defendant. And having understanding of certain threatening words which the complainant uttered [line 63] at Strensham to a servant or officer sent by the bailiff of the said City of Worcester requesting him either to forswear his coming to the sessions the next day, or to

come in peaceable manner, both which (as it were reported) he refused to do. And then sayed (as it was likewise [line 64] reported) that he had been abused by the said defendant, and that he would come to Worcester to be revenged of the said defendant, or the like furious words. All which duly considered, the said defendant had reason for his safety and defence to be accompanied with more number of persons that he usually had accustomed.

[line 65] Nevertheless the number with the defendant were nothing answerable to the false surmise of the said complainant, neither did said defendant gather his uttermost power and force, as the said complainant untruely hath alleged. And where the said complainant alleges that he peaceably came into the said City of [line 66] Worcester, and in like sort delivered his weapons, & caused those his men and followers being about the number of ____ footmen and fourtie horsemen to do the like, this defendant hath been credibly informed and (as this defendant thinketh it is right well known) that before the said complainant & they [line 67] would yeeld up his & their weapons, or promise to observe the peace, there was an offer made by some of the company of the said complainant to have entered by force, and some blows and strokes were given betwixte the complainant's company and the magistrates, people there assembled for preservation of her majestie's peace.

[line 68] And where likewise the complainant alleges that at his coming into the Sessions he made or caused to be made a proclamation demanding the observation of the peace, the same is altogether unknown unto the said defendant: for as the said defendant did hear, more was not done by the said complainant in that behalf than [line 69] upon the request of some of the Justices, together with the bailiff and officers of the said City; the said complainant there giving his promise in the open Sessions that he would for himself and his people undertake the observation of the peace during the time of the Sessions or during the time of his abode in the [line70] City; the which upon the like motion to the said defendant, he the said defendant did also undertake promise & accomplish.

And whereas the complainant hath inserted many vain and frivolous words of his knowledge of the malice of the said defendant and of Elizabeth the complainant's wife towards him the complainant with intention [line 71] by this defendant and the complainant's wife to persuade the complainant's young daughter in Religion, and thereupon the complainant (as he alleges) did send for his daughter to the said defendant's house in manner as, and about the time, in the bill alleged. The said defendant sayeth that he thinketh in his conscience, the same to be most [line 72] false and untrue, for many causes the said defendant thereunto moving, partly for that the complainant's daughter, at the time of his said sending for was not above three years old (as this defendant thinketh).

And this defendant hath heard that the complainant about the xxiiij of May last past at Strensham [line 73] aforesaid, in the hearing of the said Clynton, Rauff Horysall and others, delivered these or the like speeches ____, that he the said complainant would challenge and set down the said defendant at his own gates; and if he, the said complainant, could not procure the said defendant to come out and fight [line 74] he, the said complainant, would report to all the world most vilely of him, and if he could find any the said defendant's people or servants straggling abroad they should be well beaten.

Whereto the said Clynton (as this defendant likewise heard) then presently answered with these or the like [line 75] words that "it was dangerous to seek a man at his own house, and that the said complainant might be easily overtaken, if he had not the greater company." To which the said complainant replied to this effect, that for the danger of the law he had a good color or devise, for he would go for his daughter [line 76] whom he dearly loved, being then with his wife at Beoley aforesaid; the said complainant then and there saying further, to this effect, he had no cause to trust his said daughter in his enemies' hands, because they might poison her; further saying that he would go so strongly that the said defendant's [line 77] force should not be able to resist him.

Soon after which said speech, ___ about the first of june last past, the said complainant sent a servant of his (whose name as yet the defendant knoweth not) to the said defendant's house at Beoley aforesaid, with a letter (as this defendant thinketh) to the said Francis Clare. Which letter [line 78] the said Francis wished the messenger not to deliver if there were therein any reproachful or unseemly forms of disworship or disgrace, so thereupon the said messenger returned from the said Francis Clare to one kinsman's house at Beoley aforesaid where his house was, without delivery [line 79] of the said letter: where (to one of this defendant's servants the said messenger used speech to said effect at his departure from thence) "Tell you me" (meaning the said defendant) that his said master (meaning the said complainant) would within one fortnight come to Beoley aforesaid and fetch his daughter.

In or about [line 80] which time the said complainant (as this defendant likewise heard) gave out to diverse and sundry persons, whose names this defendant thinketh he shall be able to produce, that he, the said complainant, would be at Beoley with an hundred calivers. After this the complainant purposing to [words crossed out] [line 81] execute his great malice against this defendant, the said Edward Sheldon the defendant's son and others, the said complainant thereupon (as this defendant thinketh) caused one _____ Webbe, _____, Thom Harbert, and Walter _____, (as this defendant thinketh) all or the most part

[line 82] them being the said complainant's servants with diverse others as yet to the defendant unknown, to the number of forty evil disposed persons or thereabouts to be assembled and meet together at Strensham aforesaid in or about the third of June last past; and so assembled [line 83] caused them to be arrayed in most warlike manner with swords, bucklers, pistols, and privy coats (as this defendant verily thinketh).

And in such manner arrayed, diverse of the said persons came to or near the house of the said defendant at Beoley aforesaid about twelve of the clock of [line 84] the said day thinking (as the said defendant supposeth) to have found him the said defendant at dinner and so the better to have executed their intended villainy. And they being this and there assembled did before the said defendant's house in two places intending (as this defendant verily [line 85] thinketh) the utter spoil and destruction of the said defendant, his wife and family. And this said defendant, understanding of this their unlawful and riotous assembly, came unto the said Webbe and others at gate of the said defendant's house aforesaid with the defendant's bows and arrows in the [line 86] said defendant's defence, commanding them to depart.

Whereto the said Webbe answered to this effect, that he would not depart but would "die first," the said Webbe having not only a long sword but also a short

sword at his girdle ready to have performed his devilish intent in the [line 87] said house if he might have entered thereinto. And thereupon he the said Webbe and divers of the said evil disposed persons drew their swords at or very near the gate of the said defendant at Beoley aforesaid and then and there (as this defendant thinketh) would have assaulted the [line 88] said defendant and others in his house, but that the said defendant was then and there with sufficient persons by the defendant able to have resisted their violence and to withstand their intended practices: with the said lewd persons perceiving, they returned [line 89] from the said defendant's house, and in their way did with great oaths (as this defendant after heard) utter that if they could meet either man or boy belonging to the said defendant or to the said Francis Clare that he should die for it, or be spoiled.

By all which [line 90] circumstances this defendant verily thinketh the complainant's allegations in his bill touching as well the sending for his daughter as the manner thereof are feigned and untrue, and only to color the complainant's [crossed out misdemeanors] outrageous misdemeanors and devilish malice [line 91] towards this defendant: and this defendant is rather so moved to thinke, for that the said complainant's daughter was offered to some of the said parties so pretending to come for her and by them, not accepted. And further (as it is reported) the woman sent by the complainant to fetch [line 92] the complainant's daughter then was (as this defendant hath been credibly advertised) of very lewd

and evil disposition and conversation, for she never being married was suspected to be with child; and thereupon was before that time, either put away from the complainant's house or sent [line 93] unto her friends inhabiting in Upton parish in the said county of Worcester, as this defendant hath heard. And the day before the coming of the said complainant's men to Beoley in that riotous manner, the said woman (as this defendant hath heard) was sent for to go upon this colorable errand which [line 94] when she had performed, and was returned to Strensham, she there (as it was reported) manifested herself to be with child, showing that it was gotten in that house, and from thence she would not depart until some order were taken with her; and so shall remaineth there (as this defendant is [line 95] informed) unless some provision be lately made elsewhere to bestowe her.

And where the said complainant most untruely alleges that the said defendant the Tuesday after Trinity Sunday last did send the said Edward Sheldon his son to the said Quarter Sessions in the bill mentioned [line 96] accompanied with three hundred persons unknown out of divers counties in riotous manner with intention to break her majesties peace, and attempt some violence against the complainant: the defendant sayeth that upon divers servants given out, that the complainant would lie in wait with [line 97] a great company as well to meet the aforesaid Francis Clare as he should pass from Beoley to the house of the said Francis at Lythermister as also to encounter the said Francis Clare as he should go

to the said Quarter Sessions for the necessary service of [line 98] the Queens most excellent majestie, the said Francis Clare being a justice of peace of the said county.

Thereupon the said defendant sought, for the better safety of the said Francis Clare, did send the said Edward Sheldon with xv or xvi of his servants or there [line 99] abouts to accompany said Francis Clare to his own house and so to Worcester with Francis Clare (he, the said defendant hath cause to think, the said complainant doth most deadly hate). And for the better declaration that the intent of the said Francis and Edward Sheldon [line 100] was to preserve the peace, and with all only to defend themselves, and not attempt any violence, the said defendant was told by the said Francis Clare and Edward Sheldon that divers of the complainant's servants being at the foresaid Quarter Sessions the said Tuesday, and many [line 101] times meeting the said Francis Clare and Edward Sheldon and their company the said complainant servants were suffered to pass quietly by them, the said Francis Clare and Edward Sheldon and their company, without offense either by contentious words or deeds [line 102] to any the said complainant's servants offered, albeit the said complainant's servants used themselves most disdainful and scornful manner towards the said Francis Clare, Edward Sheldon and their company, as the said Francis Clare told the said defendant. Whereby that [line 103] manifestly doth appear that there was no meaning at all by the said

Francis Clare & Edward Sheldon to contend or quarrel with the said complainant's servants or any his followers.

And whereas the complainant in his bill most untruely maketh show that upon words [line 104] sent from the bailiff of the foresaid City of Worcester signifying some doubts and fears they had of disorders to be committed at the said Quarter Sessions, with request to the complainant to have care of the keeping of the peace, and thereupon the complainant being ready [line 105] to have come to said Sessions, in respect of their said words made stay at home and would not come to the said Sessions. The said defendant thereto sayeth that it hath been credibly reported that notwithstanding [xxxxx] from the bailiff, if he, the [line 106] complainant, could have procured any great number of gents or others to have showed his greatness, the said complainant's meaning was (as this defendant hath been advertised) to hath been at the said Quarter Sessions, there to have [xxxxx] broken the Queens [line 107] majestie's peace, and assaulted the said defendant, Francis Clare, their friends and servants if the said complainant could there have found them or [xxxxx] of them.

For this defendant thinketh it will be proved that the said Clynton did [xxxxxx] gents as also others [line 108] to have gone and accompanied the said complainant to the said quarter Session. And not prevailing in the said solicitations

(hit hath been also said) that the said Clynton did absent himself from the complainant's company which was taken also to be one cause of the said complainant's stay [line 109] from the said Quarter Sessions.

And where the said complainant pretendeth great duty and reverence towards the Right Honorable the Lord of her majesties privy council, their commandments, the same well appereth by the speedy reply he made after he had received their [line 110] honorable letters: the which being delivered unto him the Thursday the xxijth of June last (as it is reported) he made not his appearance before the Lords until the Thursday following being the xxixth of the said june, the house of the said complainant where the said letters were [line 111] delivered not being four score miles distant from the court then at Greenwich where the said Lords were then assembled.

Without that, that the said Harper was sent unto the house of the complainant at Strensham to taketh away the said complainant's wife to _____ the said [line 112] bill mentioned; or that the said Harper by the commandment of this defendant, or to this defendant knowledge, used such insolent and proud language words of challenge and ostentation unto the said complainant in such manner and form as in the bill alleged. Or that the said [line 113] Harper by this defendant's commandment, or to this defendant knowledge, did say that the defendant should

give meeting when and where the said complainant should call him in such manner and form as in the said bill, is untruely alleged.

And without that, that the said Clynton [line 114] to the defendant's knowledge, did come to Beoley to let the said defendant understand of the great abuses and unseemly usage of the said Harper in speech and otherwise, and to be persuaded whether the same was by the defendant's commandment or not, and to none other end or intent in [line 115] this world. Or that the said defendant so soon as the said defendant came in the presence of the foresaid Clynton at Beoley aforesaid did breake forth into such raging and proud speech in such manner and form as in the bill of the complainant, is most untruely set forth and [line 116] declared.

And without that, that this defendant procured one Rowland Baugh to deliver out by public speech unto the said complainant that the said defendant would be at Harnell woods as in the said bill is untruely alleged. Or that the said defendant to his knowledge [line 117] came into the said Harnell woods, being the complainant's inheritance, unless it were for availing through the same to the defendant's woods at Bucknell aforesaid, which this defendant neither did, to his now remembrance, as in the said bill is untruely alleged.

And without [line 118] that, that the said defendant the xxth of April being the day of the Quarter Sessions at Worcester, or long before, had gathered a power and force together in a readiness, as well within the county of Worcester and others the counties in the bill specified to the [line 119] number of three hundred, as in the said bill is most untruely alleged.

Or that the said defendant in seven years before had never with his presence or otherwise showed or expressed any kind of duty in her majesty's service within her said county or to none of Worcester, [line 120] as in the said bill of complaint is most falsely set forth and declared.

And without yet that that the said defendant, upon coming of the complainant servants to his house at Beoley, had ready in arms and the number of one hundred persons, or to the defendant's remembrance [line 121] cryed out "kill these villains" or asked where Russell was, as in the said bill is untruely alleged and declared.

Or that the said defendant with his company did so and such manner assault, wound, beat, and persuade the servants of the said complainant to flight [line 122] shoots out of his house, continuing his furious speeches, as in the said bill is untruely alleged. For this defendant saith that none of this defendant company did assault any of the complainant's servants, until that some of the complainant's did

draw their weapons [line 123] and after assault. And this defendant did what he could to pacify them, and to keep the complainant's servants from hurt, and did at the last cause the broil to cease and gently entertained with beer and other relief divers of the said servants of the complainant.

[line 124] Or that the said defendant sent Edward Sheldon his son to the next Quarter Sessions at Worcester and being the Tuesday next after Trinity Sunday last, or that the said Edward Sheldon, to this defendant's knowledge, the said day and time went to Worcester [line 125] in such manner and form and to such end, intent and purpose as in the said bill is alleged. And without that, that the said defendant procured and set forward Edward Sheldon, Francis Clare, Henry Clare and all servants friends and followers [line 126] of the said defendant to expect the coming to London of the said complainant, as in the said bill is most falsely set forth and declared.

And without that, that any other matter, cause, or thing in the said bill of complaint perfectly and sufficiently alleged [line 127] which the defendant thinketh to be material or effectual for this defendant to answer unto as true in such manner, sort and form as in the said bill of complaint is suggested.

All which matters this defendant is ready to aver and prove, as this [line 128] honorable court shall understand. And prayeth to be dismissed out of the same, with his reasonable costs and charges therein most wrongfully sustained.

IV. The original deposition document from the UK National Archives is found on the next page. The transcription was made directly from this document by this author.

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