

**SUMMARY:** The joiner Edward Johnson's lawsuit against Oxford's widow in the Court of Requests for work allegedly done on a manor of Oxford's is confusing in the extreme because it is clear that the manor, as Johnson and his witnesses identified it, did not exist. Oxford owned lands called Playstowe in the village of Halstead in Essex, but this property was a farm valued at only 20 shillings a year in Oxford's 1604 Inquisition Post Mortem, and cannot have been the manor on which Johnson claimed to have worked. Oxford also owned a manor in an entirely different part of Essex near the village of Plaistow. This manor was Bretts, located in West Ham. It is possible that Johnson had heard of these two properties, and had confused them in his mind, coming up with a claim which involved a manor called Plaistow which did not exist.

In his bill of complaint Johnson alleges that in 1588 Oxford requested that Johnson do some joiner's work on his manor at Plaistow, which Johnson and his men did to the value of £40 in wages and £18 in goods, and that only £3 of the amount due had been paid. After Johnson did the alleged work in 1588 more than twenty years passed before he filed suit, and in the interim Oxford died intestate in 1604. It was only on 11 February 1609, according to the endorsement on his bill of complaint, that Johnson finally filed suit against Oxford's widow, claiming that since she had taken control of all Oxford's good and chattels after his death, she was liable for payment of the alleged debt.

The Countess' answer is very revealing because it is clear from it that Oxford must have been debt-free in the latter part of his life. The Countess says that after she married him, and during his lifetime, no workman or other person ever claimed an unpaid debt owing by Oxford except for a certain tailor (who is known from other documents to have been William Ruswell), whose widow's claim for an alleged debt was overthrown by Edward Hubberd, one of the Six Clerks of Chancery and a former servant of Oxford's, who proved the debt to have been fully discharged. Moreover the Countess says that after Oxford's death no person ever made any claim to her, as his widow, for debts owing by Oxford other than Thomas Gurling, whose claim was also proven at trial to be baseless, and the alleged debt to have been fully discharged. The Countess then turns to Johnson's allegations, stating that heretofore Johnson's claim had been solely for work done at Oxford's house near Bishopsgate called Fisher's Folly, and that it was not until she read the bill of complaint that she ever heard of any allegation by Johnson that he was owed money for work allegedly done for Oxford on a house at Plaistow. The Countess points out that Johnson has left blank in his bill of complaint the name of the county, which she takes as proof that he does not even know where the manor on which he claims to have worked is located. Moreover the Countess says that Johnson's claim that Oxford contracted personally with him for the work to be done is manifestly false since it is well known to everyone that Oxford invariably handled all such matters through his officers. The Countess says further that Oxford always maintained while he was alive that he owed Johnson nothing, and that any money she herself gave Johnson's after Oxford's death was not in payment of any alleged debt, but merely for charity because of Johnson's claims of poverty. (Incidentally, Oxford's characteristic generosity did not desert him in the last years of his life. Francis Columbello says that although Oxford was

impatient with Johnson's baseless claims, 'sometimes he hath awarded money there, as forty shillings at a time').

Four witnesses – Johnson's former workmen John Bennett and Thomas Harvey, Johnson's friend Robert Mefflin, and Oxford's former servant Francis Columbello – were deposed to answer to interrogatories. Columbello, Oxford's servant, stated that he had never heard of Oxford owning a house in Essex called 'Plaistow house', and none of the other three witnesses was able to offer any proof that any such house existed. The fact that these three witnesses insisted on the existence of a house which no-one else had heard of suggests collusion, particularly when there appears to be no contemporary historical record of any kind which mentions the existence of a 'Plaistow house' in Essex, let alone a 'Plaistow house' owned by Oxford.

The outcome of the case is unknown. The Countess died on or about 1 January 1613.

#### PRO REQ 2/388/28/1

Humbly complaining showeth unto your most excellent Majesty your Highness' faithful & obedient subject Edward Johnson of the parish of St. Ethelburgh within the ward of Bishopsgate, London, joiner, that whereas your said subject being a handicraftman, and exercising the trade of a joiner, about the year of Our Lord God one thousand five hundred eighty-eight was requested by the right honourable Edward, late Earl of Oxford, deceased, that, all other affairs set apart, your said subject should work for him, the said Earl of Oxford, at his house at Plaistow in the county of Essex in several kinds of work, as to saw for and to wainscot divers places & rooms in the said house, & to do such other work as did belong unto his trade, bargaining & agreeing with your said subject that what work soever he, your said subject, or any of his servants should do for him, the said Earl of Oxford, he would see that your said subject should not only be duly & truly paid their wages for the work they should so do, being sixteen pence a day & as much for every one of his servants which did work for him, the said Earl of Oxford, but would further recompense him, your said subject, for his care, diligence, & pains, whereupon said Earl of Oxford appointed out your said subject such work as he & his servants should do, according to which agreement & bargain your said subject and his servants did work for him, the said Earl of Oxford, in his lifetime many years together upon such work as were appointed unto them, as in sawing wainscots into leaves and in sawing wainscots for crests & making doors of wainscot, wainscotting of other places & [ ] about Plaistow house, and in much other such kind of work;

And your said subject after that he & his men had wrought there for the said Earl a long time, then he, your said subject, repaired to the said Earl of Oxford and requested his Lordship that in regard he and his men had wrought there so long a time and their wages grown to a good sum of money, that his Lordship would be pleased to take order for the payment of such sum and sums of money as were & should by his bills appear to be due unto them, whereupon his Lordship gave your said subject this answer, that he should

make his bills up & set down the particulars how much he was indebted unto him, & he would satisfy & pay unto him all such money as was due, whereupon your said subject caused the several sums (amounting to forty pounds in money & eighteen pounds in goods) which his Lordship promised to satisfy, and which was set down in bills which were particularly due unto him, your said subject, for and in respect of his said work, and delivered the same to the said Earl of Oxford, and thereupon his Lordship told your said subject he should have his money within a short time after, and did often acknowledge the same to be due unto your said subject, and spake to and entreated the Lady of Oxford, his then wife & now widow, to satisfy the same, whereupon your said subject received some thereof at several times amounting to the sum of three pounds or thereabouts, & the residue which was behind & unpaid your said subject expected to have received not long after, but what with the delay of the Earl of Oxford himself, his said Lady, & with the delay of his officers, your said subject was from time to time put off from the receipt of such money as was due unto him, by means of which delays your said subject, being without his money, and being indebted in divers places for himself & for his men, was arrested three or four several times and was enforced to take up money at interest & to lay most part of his goods to pawn (to his great loss and hindrance) to pay those debts which he was arrested for, which money your said subject should have received of the said Earl of Oxford to have satisfied unto those whom he was indebted;

But now so it is, may it please your most excellent Majesty, that the said Earl of Oxford is dead intestate, & all his goods & chattels whatsoever are come to the Lady Elizabeth, his late wife, who hath and enjoyeth the same, never taking any letters of administration thereof, but converting & altering the same to her own use, so as if letters of administration should be procured to your said subject, yet is the estate in such manner disposed by the said Lady of Oxford as your said subject cannot by any means of law recover his said rightful & due debt, and whereas your said subject since the death of the said Earl of Oxford hath demanded the said money of her, the said Lady Elizabeth, Countess of Oxford, and whereas she hath from time to time delayed your said subject & of late (as your said subject thinketh) not out of a dishonourable disposition but by untrue information and persuasion of some unconscionable persons, saith that she doth believe the said money was all paid in the lifetime of the said Earl of Oxford, her husband, whereas there was but a small part as aforesaid paid in regard of that that your said subject should have received for his work aforesaid;

In tender consideration whereof, and forasmuch as all or the most part of the said money which is owing unto your said subject was laid out of his purse for meat & drink for himself & his men & for his men's wages and for labourers' wages which he hired, and in regard the said Earl of Oxford in his lifetime entreated the said Lady to pay unto your said subject all such money as was due unto him, and it being all the whole estate and stay he hath to live upon during his life, he being now very poor & aged & not able to take pains to get his living as formerly he hath done, is like utterly to be overthrown & undone, his wife & children, forever unless by your Highness' accustomed favour your poor subject be herein relieved, may it therefore please your Highness, the premises considered, to grant unto your said subject your Majesty's most gracious writ of Privy Seal or other commandment to be directed unto the said Lady Elizabeth, Countess of

Oxford, commanding her thereby at a certain day and under a certain pain therein to be limited to be & personally appear before your Highness' counsel in your Highness' Court of Whitehall at Westminster then and there to answer the premises & to set forth upon her oath whether in conscience the said money be due or no, & whether the said Earl of Oxford in his lifetime did not entreat the said Lady of Oxford to pay unto him, your said subject, all such money as was due unto him upon his bills, & whether she hath paid the same since his death or no, and to show cause why she should not forthwith out of the goods & chattels which she hath by the said Earl satisfy the said debt unto your said subject, and farther to stand to & abide such order and direction therein as to your Highness' counsel of the said court shall seem to stand with equity & conscience, & your said subject according to his bounden duty shall daily pray to God for the preservation of your Highness in health & happiness long to reign over us.

Endorsed: xjo die februarij anno [ ] sexto [ ] Quaeris admissus est in forma pauperis

[Translation: On the 11<sup>th</sup> day of February in the sixth year [=1609] [ ] you seek(?) it has been admitted in the form of a pauper.]

fiat Breve de Privato Sigillo [ ] ad comparend{um} in Curia commune Regis in xva [ ] sub pena Cli

[Translation: A writ of privy seal shall be made [ ] to appear in the Court [ ] in a quidene [ ] under pain of £100.

PRO REQ 2/388/28/2

xo die Novembris Anno Regni Regis Jacobi Anglie Francie & Hibernie octavo et Scotie xliiijo

[Translation: On the 10<sup>th</sup> day of November in the eighth year [=1610] of the reign of James, King of England, France, & Ireland, and of Scotland the 44<sup>th</sup>]

The answer of the Lady Elizabeth Vere, Countess Dowager of Oxenford, to the bill of complaint of Edward Johnson, complainant.

The said Lady Elizabeth, Countess Dowager of Oxenford, to give satisfaction to this honourable court & to all others how false, unjust, & clamorous the said complainant's demands & allegations by him set forth in his said bill of complaint are, for answer to the same bill of complaint saith that she doth not know that Edward, late Earl of Oxenford, her deceased husband, had ever any house at Plaistow in the said bill of complaint mentioned, and is well assured that he never had any such sithence his marriage with her, the same being now almost twenty years sithence, neither doth she, the said Lady Countess Dowager, know or ever heard that the said complainant was ever employed in any work of the said late Earl's either before the time of her marriage with the said Earl

or sithence, and if he were, yet she is verily persuaded that he was fully satisfied & paid for all such work as he did or performed for the said Earl as soon as he had done & finished that work he undertook or else beforehand, for the said Countess saith that in all the time sithence she married with the said late Earl, she to her now remembrance never heard of any workman or other person whatsoever that ever made demand or challenge of any debt owing to him by the said late Earl except one by one (blank) [=William Ruswell], who having been a tailor for the said late Earl his servants, did first demand & after sue for a certain debt he pretended to be due & owing unto him by the said Earl, supposing the same Earl could not have proved any payment or satisfaction of that debt, but yet prevailed not for that when that cause came to trial one Hubberd, then one of the Six Clerks of the Chancery, who formerly had been employed in the said Earl his affairs, did make plain & manifest proof when & how the said debt was clearly & fully satisfied & discharged;

Neither to her remembrance hath she, the said Countess Dowager, at any time sithence the said late Earl her husband's decease been ever demanded any debt owing by the said late Earl except only by one Thomas Gurling, who suing for a debt pretended to be due unto him from the said late Earl was at the trial thereof overthrown upon manifest proof made of the satisfaction of that debt, & also by the said clamorous complainant, who first & for a long time together did challenge his pretended debt for work by him done at a house without Bishopsgate, London, heretofore the said late Earl's but by him sold away before his marriage with her, neither did she to her best remembrance ever hear the said complainant make mention of any work he had done for the said late Earl at any house at Plaistow until she heard the said bill of complaint read in which he so surmiseth the same debt to grow, neither, as it seemeth by the blank left in his said bill (for inserting the name of the county) doth the complainant as yet know in what county the said house at Plaistow lieth in which notwithstanding in his said bill he suggesteth himself to have performed that work for which he thereby challengeth a debt of about threescore pounds, which well sorteth with other his allegations in the same bill whereby he setteth forth as a ground of the contract upon which he buildeth the demand of the said debt that the said Earl himself did send for him, did in person hire & agree with him for the manner of his work & certainty of his wages, whereas it is too well known the said Earl in matters of building or other employment (though of a far greater weight & consequence) did never descend to any such particular managing of his own affairs, but referred the ordering, disposing, & payments of & for them to his officers & servants;

And where the complainant in his said bill suggesteth that the said late Earl oft acknowledged the said debt to be owing to the said complainant, promised him speedy payment, & spake to her, the said Lady Countess Dowager, to pay & satisfy the same, for answer thereunto the said Countess utterly denieth that ever the said late Earl did speak to her to any such effect or purpose, but contrariwise when the said complainant did sometimes in a frantic manner come & with clamour importune the said Earl for some money he then pretended the said Earl owed him for work he had done at his said house without Bishopsgate, London, the said Earl hath oft in her presence or hearing protested he owed him nothing at all, and that he would cause him to be laid by the heels if ever he came more to him about any such matter, neither would the said Earl ever give him or

suffer anything to be given unto him lest that should encourage him at other times to come & revive his clamorous demands;

And where the complainant surmiseth that upon the said Earl's entreating of her, the said Countess Dowager, to satisfy the said complainant the said debt, he, the said complainant, hath at several times received (as part of his said debt) three pounds or thereabouts, the said Countess for answer thereunto saith that sundry times sithence the death of the said late Earl the said complainant hath with great clamour importuned her for some money, sometime upon Christmas & other festival-days swearing & protesting he had no bread for his dinner that day, & thereupon out of mere commiseration & pity she hath given unto him sometimes ten shillings & sometimes five shillings at a time, but never gave him so much as one penny in part of payment or satisfaction of any debt he claimed, but merely & only out of a charitable respect of that extreme necessity wherein he pretended himself to be, of which he hath (as the same Countess hath sithence perceived) been so far from a thankful acceptance that he hath thereby been encouraged to further clamour & importunity, which hath made her, the said Countess, to resolve never hereafter to be drawn either by his pitiful lamentations or his clamorous importunities to bestow any penny more upon him, as being fully satisfied & persuaded in her conscience that there is not so much as one penny due unto him by or from the said late Earl, her deceased husband;

Without that that the late Earl Edward did ever employ him to work at any his house at Plaistow, or did ever agree with him for any wages, or ever accepted any bills of reckonings from him, or ever acknowledged any debt to be owing to him or promised him payment of any money as in the said bill of complaint most falsely and clamorously is alleged, and without that that any other matter or thing in the said bill of complaint contained material or effectual to be answered unto & not before herein sufficiently answered, confessed & avoided, traversed or denied is true, all which matters [ ] the said Lady Countess Dowager is ready to aver & prove as this honourable court shall award, & prayeth to be dismissed out of the same, and that the said complainant may be well punished for his false & untrue clamour.

PRO REQ 2/388/28/3

xvto die Aprilis Anno Regni Regis Iacobi Anglie ffrancie & hibernie nono et Scotie xliiijo

[Translation: On the 15<sup>th</sup> day of April in the ninth year [=1611] of the reign of James, King of England, France, & Ireland, and of Scotland the 44<sup>th</sup>]

The replication of Edward Johnson, complainant, unto the answer of the Lady Elizabeth Vere, Countess Dowager of Oxenford, defendant.

The said complainant, not confessing or acknowledging any the matters material or effectual in the said defendant's answer to be true in such sort, manner, and form as they be therein set forth & declared, saith that the said defendant's answer is uncertain and insufficient in the law to be replied unto for divers apparent causes & manifest imperfections therein contained, the benefit and advantage whereof now and at all times hereafter unto the said complainant saved & reserved, the said complainant for replication thereunto replieth and saith in all & every thing & things as before in his said bill of complaint he hath already said, & doth and will aver, maintain, and justify all and every the matters in the said bill of complaint contained to be just, true, certain, and sufficient in the law to be answered unto in such sort, manner, and form as they (in and by the said bill of complaint) be most justly, plainly, & truly alleged and set forth, all which matters the said complainant is and will be ready to aver and prove as this honourable court shall award, and prayeth as formerly in his bill of complaint he hath already prayed.

PRO REQ 2/388/28/4

Interrogatories to be ministered to the witnesses to be produced on the part and behalf of Edward Johnson, complainant, against the Lady Elizabeth Vere, Countess Dowager of Oxenford, defendant.

1. Imprimis, do you know the parties, plainant or defendant, or any of them?
2. Item, did you not likewise know one Edward, late Earl of Oxenford, deceased?
3. Item, do you not know or have heard that the said Edward, Earl of Oxenford, was possessed of a house within the county of Essex called or known by the name of Plaistow house, and do you not likewise know that the said Earl hath also been possessed of a house in Bishopgate Street in London? Declare as you have credibly heard.
4. Item, whether do you know or have heard of any contract or agreement made by the said Earl with the complainant for the working and finishing of certain joiner's work? If yea, where did the said complainant or his servants so work the same? Declare your knowledge therein, and as you have credibly heard.
5. Item, do you know or have heard what sum or sums of money the said Earl agreed to pay to the said complainant, him and his servants, and whether did the said complainant work by the great or by the day? If by the day, what wages did the said Earl allow the said complainant and his servants? Declare your knowledge herein [ ] & as you have heard.
6. Item, do you know or have heard that the said Earl of Oxford before his death was indebted to the complainant, & whether did he not die indebted to the complainant? If

yea, in what sum or sums was he so indebted, & for what was he so indebted to the complainant? Declare your knowledge herein & as you have credibly heard.

7. Item, do you know or have you heard that the said complainant hath proffered any bill or bills of account to the said Earl of Oxford? If yea, for what were the same bill or bills of account, and what answer or speeches did the said Earl use upon the receipt and view of the same? Deliver your knowledge herein.

8. Item, whether do you know or have heard that the said Earl of Oxenford a little before his death did speak & desire the said Lady, the now defendant, to pay the said complainant his money due by his bill or bills? If yea, what were the words he, the said Earl, did then use to the said Lady? Declare your knowledge.

Item, if you know or have heard of any other matter or thing material concerning this cause in variance between the said Lady and the now complainant, declare your whole knowledge herein, or as you have credibly heard. Finis.

PRO REQ 2/388/28/4.1

xjto die Novembris Anno Regni Iacobi Regis Anglie &c nono et Scotie xlvo ex parte complainant.

[Translation: On the 11<sup>th</sup> day of November in the ninth year [=1611] of the reign of James, King of England etc., and of Scotland the 45<sup>th</sup> on the part of the complainant.]

John Bennett of the parish of All Hallows Staining in Mark Lane, London, joiner, of the age of threescore and four years or thereabouts, sworn and examined the day and year abovesaid, deposeth and saith.

To the first interrogatory, this deponent saith he knoweth the plainant for he was his master, but the defendant he knoweth not.

To the second interrogatory, this deponent saith he did very well know Edward, late Earl of Oxford, deceased.

To the third interrogatory, this deponent saith he knoweth that Edward, Earl of Oxenford, was in his lifetime possessed of a house within the county of Essex called and known by the name of Plaistow house, and knoweth that the said Earl of Oxenford was likewise possessed of a house in Bishopsgate Street, London, sometimes called Fisher's Folly, for this deponent did as journeyman and servant unto the plainant work joiner's work there for the said Earl of Oxenford, and was weekly honestly & truly paid by the plainant for his work there done in those two houses, and more he cannot depose.

To the 4<sup>th</sup> interrogatory, this deponent saith he knoweth the plainant did for the Earl of Oxenford aforesaid finish certain joiner's work in the said two houses aforesaid, and paid this deponent and other workmen that wrought under his command there for him their wages truly and duly every week, but what contract, bargain, or agreement was made by the said Earl or his steward or servants with the plainant for the same work he knoweth not, nor of any payment or satisfaction made to the plainant (for his work and his servants and journeymen there done in the said two houses) by the said Earl of Oxenford or any other for him, and more he cannot depose.

To the 5<sup>th</sup> interrogatory, this deponent saith that the plainant wrought with the said Earl by the great, but how they agreed for the work he knoweth not, nor what sum or sums of money the Earl agreed to pay the plainant and his servants by the great nor by the day, for he was not acquainted therewith, only saith the plainant paid this deponent sixteen pence per diem, and sometimes four shillings per week meat, drink, and lodging for his work, and more he cannot depose.

To the sixth interrogatory, this deponent saith he knoweth not how much money the Earl of Oxenford was indebted to the plainant when the Earl died, nor that he was indebted to the plainant when he died, for he was not acquainted with their private dealings together about the same, and more he cannot depose.

To the 7<sup>th</sup>, 8<sup>th</sup>, and 9<sup>th</sup> interrogatories this deponent saith he can say nothing for that he knoweth not what money the said Earl of Oxenford paid the plainant upon their agreement, nor what agreement they made together, nor what money remained unpaid the plainant at the time of his death, nor what speeches his Lordship used unto his now Lady on his deathbed touching the plainant. And more he cannot depose.

John Bennett

PRO REQ 2/388/28/4.2

Thomas Harvey of the parish of Stepney in the county of Middlesex, joiner, of the age of threescore and eight years or thereabouts, sworn and examined the day and year abovesaid, deposeth and saith.

To the first interrogatory, this deponent saith he knoweth the plainant, for he was his servant eight years or thereabouts, but the defendant he knoweth not, and more he cannot depose.

To the second interrogatory, this deponent saith he did know Edward, late Earl of Oxenford, deceased.

To the third interrogatory, this deponent saith he knoweth that the said Earl of Oxenford was in his lifetime possessed of a house called Plaistow in the county of Essex, and

likewise possessed of a house in Bishopsgate Street, London, called Fisher's Folly, for this deponent wrought for the Earl of Oxenford joiner's work under the plainant, who paid him, this deponent, weekly for his work done for his Lordship, and more he cannot depose.

To the 4<sup>th</sup> interrogatory, this deponent saith he knoweth not what contract or agreement was made by the said Earl of Oxenford with the complainant for the working and finishing of certain joiner's work, but saith that the plainant did by himself and his servants work in the said Earl his works, and paid this deponent and other workmen their wages for their work there done weekly, and more he cannot depose.

To the 5<sup>th</sup> interrogatory, this deponent saith he never knew what sum or sums of money the Earl of Oxenford agreed to pay to the plainant and his servants, nor knoweth whether the plainant wrought by the great or by the day, only saith that they, the journeymen and servants, took the Earl's work from the plainant and he paid them and bought the stuff, and often told them that the Earl was greatly in his debt, and that he could not get money of him, and more he cannot depose.

To the 6<sup>th</sup> interrogatory, this deponent saith that the plainant always told this deponent that his Lordship was indebted to him at the time of his death the sum of about thirty-six pounds, and more he cannot depose.

To the 7<sup>th</sup>, 8<sup>th</sup>, and 9<sup>th</sup> interrogatories this deponent saith he can say nothing more than he hath already deposed, save only when they wrought in the Earl of Oxenford's said works he heard his Lordship and the plainant often confer about their work, but he never heard his Lordship confess what he owed the plainant for work and stuff bestowed about and in his houses, and more he cannot depose.

(signed with a mark)

PRO REQ 2/388/28/4.3

Robert Mefflin of the parish of St. Ethelburgh within Bishopsgate, London, leather-seller, of the age of fifty years or thereabouts, sworn and examined the day and year abovesaid, deposeth and saith.

To the first interrogatory, this deponent saith he knoweth the plainant very well, and the defendant but by sight

To the second interrogatory, this deponent saith he did know Edward, the late Earl of Oxenford, deceased, for he was with him sometimes when the plainant was with him.

To the third interrogatory, this deponent saith he knoweth that the late Earl of Oxenford was possessed of a house within the county of Essex called and known by the name of

Plaistow house, and also of a house in Bishopsgate Street called Fisher's Folly, and more he cannot depose to the same interrogatory.

To the fourth interrogatory, this deponent saith he knoweth not what contract and agreement was made between the said late Earl of Oxenford with the plainant for the working and finishing of certain joiner's work, but saith he knoweth the plainant, and his servants and journeymen under him did work joiner's work for the said Earl in the said houses for he was privy to the same, and more he cannot depose.

To the 5<sup>th</sup> interrogatory, this deponent saith he knoweth not what sum or sums of money the said Earl agreed to pay the plainant and his servants, nor whether they wrought by the great or by the day, and more he cannot depose

To the 6<sup>th</sup> and 7<sup>th</sup> interrogatories, this deponent saith he remembereth that about sixteen years since [=1595] the plainant desired this deponent to go with him to the late Earl of Oxenford, which this deponent did, and there at his Lordship's lodging in Greenwich the plainant moved his Lordship in this deponent's hearing for money, but how much he remembereth not, but as the plainant reported for about six and thirty pounds which his Lordship then owed the plainant for joiner's work and stuff, unto which his Lordship answered saying, Be content, joiner, I have no money to pay thee; take up so much money at interest to serve thy turn and I will pay for it and pay it again; thou shalt be no loser by me, with which answer the plainant rested satisfied, and left his Lordship, and more he cannot depose.

To the 8<sup>th</sup> and 9<sup>th</sup> interrogatories this deponent saith he hath heard it credibly reported that the Earl of Oxenford before he died desired the defendant to pay the poor man his money due to him, and more he cannot depose.

Robert Mefflin

PRO REQ 2/388/28/4.4

Deposition capta apud Westminster decimo quarto die Iunij Anno Regni Iacobi Regis Anglie &c decimo et Scotie xlvto ex parte Edwardi Iohnson complainant versus Elizabethe Vere Comitisse Dowager de Oxonie defendant.

[Translation: Deposition take at Westminster on the fourteenth day of June in the tenth year [=1612] of the reign of James, King of England etc., and of Scotland the 45<sup>th</sup> on the part of Edward Johnson, complainant, versus Elizabeth Vere, Countess Dowager of Oxenford, defendant]

Francis Columbell of Hackney in the county of Middlesex, clerk, of the age of thirty-nine years or thereabouts, sworn and examined the day and year abovesaid, deposeth and saith.

To the first interrogatory, this deponent saith he knoweth the plainant and defendant.

To the second interrogatory, this deponent saith he did know Edward, late Earl of Oxenford, deceased, for he served him.

3. To the third interrogatory, this deponent saith he doth not know that Edward, Earl of Oxenford, was possessed of a house in the county of Essex called by the name of Plaistow house, but hath heard that the said Earl had a house in or near Bishopsgate, London, called Fisher's Folly.

To the 4<sup>th</sup> interrogatory, this deponent saith he never knew nor heard of any contract had or made between the Earl and the plainant for finishing of any joiner's work in either of the said houses, nor knoweth that the plainant and his servants wrought the joiner's work in those or either of those houses of the Earl's but by the plainant's coming to the Earl to his house in Hackney aforesaid for money.

To the 5<sup>th</sup> interrogatory, this deponent saith he knoweth not whether the plainant wrought by the day for day-wages, or by the great, he and his servants, and more he cannot depose.

To the 6<sup>th</sup> and seventh interrogatories, this deponent saith that the plainant did oftentimes before the death of the Earl of Oxenford aforesaid resort to Hackney to the said Earl and offered him bills of accounts and reckonings for work by him and his servants done for the Earl but could not be heard, whereupon he, this deponent, hath heard the Earl call to his Lady, the now defendant, and bid her get him out of the yard and so he were satisfied, and sometimes he hath awarded money there, as forty shillings at a time, but whether he hath been satisfied his full due this deponent knoweth not, and more he cannot depose.

To the 8<sup>th</sup> interrogatory, this deponent can say nothing more then he hath formerly deposed touching the same.

To the 9<sup>th</sup> interrogatory, this deponent saith he can say nothing touching the same interrogatory more than he hath already deposed.

Francis Columbell