

Matilda & William Pearson

Trial of Henry Hunt, Part 2 (Kings Bench hearing), 225-31.

AFFIDAVITS OF MATILDA PEARSON and WILLIAM PEARSON, (her Husband,) tendered to THE Court of King's Bench by the Defendants, when brought up to receive Judgment,

In the King's Bench,
MATILDA PEARSON, of Clegg's-buildings, Canal-street, Manchester, maketh oath and saith, that on Sunday the twelfth day of April last, an officer attached to the town of Manchester, called at the house of this deponent and desired her to accompany him to the-office, where this deponent saw J....S....., the.....who said to this deponent, "Oh, your name is Pearson, was not you at Johnson's, seeing Mr. Hunt about some property? to which she replied, that she was, and had consulted with that gentleman, who upon hearing her relation of the circumstances, recommended her to apply to some solicitor, as he himself was incapable of advising her upon the subject, and that the said J... S..... then asked the deponent, whether her husband was in work, as he understood that he had been out of employ great part of the winter; and stated that he (the said, J... S.....) could be a great friend to her, if she would come to the-office on Monday and do as he wanted her to do, and that he could get her property for her. That deponent asked what he wanted her to do; when he replied, that she must swear what he wanted her against Hunt, for they wanted to hang him, and if she would swear it they, should, be able to hang him: that deponent was very much alarmed, but said she would do so, but that she was afraid of her neighbours; when S..... said to the deponent, that they would put them into one of Nadin's houses, where nobody should molest her. And this deponent further saith, that S.....then said, we have got Johnson's gardener to swear against Johnson, and if you will swear against Hunt, we shall hang them both. And this deponent [226] further saith, that she then left the-office, and returned home; and that she went again to the.....-office on Monday the seventeenth of April last, when she saw S....., who took the deponent into an inner rom, and having waited there a few minutes, he took her to the Coach and Horses in Deangate, where he had some brandy and water, and told this deponent to drink. And this deponent further saith, that S..... then said to this deponent, if you will do all I want you to do against this rascal Hunt, Nadin will do anything for you, but he does not known anything of it yet. That deponent then said, I had better tell my husband about it, to which he replied, no, no until you come up to theoffice about it. And this deponent further saith, that S..... said to this deponent, I will take you to a gentleman, who will be an unknown friend to you, but you must keep it a great secret, what is going to be transacted there. That deponent and S..... then went to Mr. H....'s house , and saw Mr. H in the passage, and after S..... had whispered to him something which this deponent did not overhear, H.... said to the deponent, "Oh, your name is Pearson," and sent deponent into the kitchen, and after deponent had remained there about ten minutes, S..... called deponent, and took her into an office where Mr. H.... was standing, who said to deponent, Mrs. Pearson sit down, and then directed S..... to take a sheet of paper, which he did. H.... then said to deponent, I hope you have no objection to what he (pointing to S.....) asked you, and then quitted the room, and after S..... had written a short time, H.... again returned, and looked over what S..... had written, and desired deponent to go out of the room, which she did, and waited in the passage, and the door being shut, deponent listened at the key-hole, and heard H....., say to S....., why did you not give her a good deal to drink, and then we could have

finished this business here, and got her to sign it, you see the woman is quite frightened: S..... replied, no, but tell her about money, and that will tempt her; and after a few minutes S..... opened the door and admitted deponent, and said, come and sit down against me, Mrs. Pearson. And deponent further saith, that Mr. H... then again left the room, and S..... said to deponent, "damn it, woman, don't be frightened;" to which deponent answered, "you are enough to frighten any one;" that S..... then said, "now I will finish the paper, and then you shall sign it;" but deponent said I cannot write: S.....replied, I will write it, and you shall make your mark: I will go and shew it to some gentlemen, and then it must be drawn again, and you will have to swear to it, and when it is signed you will have a very handsome present of money, but when it is all settled you shall be a lady, and your husband a gentleman, and assured this deponent, that her husband would have a situation and have no more occasion to work at his business. And this deponent further saith, that S..... said to her, in answer to an enquiry as to the purport of the affidavit which he wished her to make, that she must swear that Hunt walked with her as far as the halfpenny bridge, (which is about ½ mile from Johnson's house) and that during that time that Hunt said to her, that the Prince Regent ought to be served the same as Louis the sixteenth, and that Hunt also said, that he could contrive something which would destroy the New Bailey, and then the prisoners would be soldiers for him: that he would level all property, and bring the magistrates [227] down upon their knees: and that she must swear that this conversation between Mr. Hunt and herself, took place three days before the Whitemoss business. And this deponent further saith, that S..... also told her that she must get a letter written as if from Mr. Hunt, promising to attend to her business, and that deponent must swear that she received this letter from Mr. Hunt on the Friday before the Whitemoss business, and must soil and dirty it, as it must be shewn: and S..... having then ceased writing, said to deponent, I must fill it up, and you must meet me at our office this afternoon at three o'clock. And this deponent further saith, that on the same Monday, the seventeenth of April, at three o'clock, deponent again went to the-office and saw S....., who sent some person to see if Mr. H.... was at home, and on the return of the messenger, deponent accompanied S..... to Mr H....'s, who was standing on the step of the door of this house, and who asked the deponent how she did, to which she replied very poorly; and that he then said, "nevermind, you terrify yourself;" that H.... and S..... then left deponent in the passage, and went into a room for a few minutes, and on their coming out, H.... said to deponent, this gentleman (pointing to S.....) will tell you that to do: that S..... and deponent then came out and went to the door of the police-office, when S..... said to the deponent, we cannot do it now, come down to the-office tomorrow morning. And this deponent further saith, that S..... then said, you look poorly, you had better take a glass of something to drink, and offered her a shilling, which she refused, on which he said take it then, for to get your husband something, he then put the shilling into her hand. And deponent further saith, that she went on the morning of Tuesday, the eighteenth of April last, to the-office, and saw S....., who came with the deponent to the door of the office, and said to deponent, we are giving you a great deal of trouble but you shall be well paid for it; he then asked deponent to take a glass of something to drink, but deponent refused, and S..... then said to deponent, you must come up this afternoon, and all shall be settled. And this deponent farther saith, that on Tuesday afternoon she again went to the-office, and saw S....., who took deponent into an inner-room, and asked her if she had got the letter written, to which deponent answered no, for that he had better do it; he said, no, that would not do, for they would know his hand writing; and informed this deponent, that the paper was not finished, but it would be in the morning; and then deponent must swear the

affidavit, at which time deponent should have some money, which would be very handsome: that S..... then pressed deponent to get the letter done, purporting to come from Hunt: and deponent then said, if he would give her a note that she could not come to any harm, to shew her husband, she would get the letter wrote, and bring it; that S..... then said to deponent, it shall all be settled tonight, and desired deponent to come at eight o'clock to the-office, and then would take deponent to the Coach and Horses; S..... then, as deponent was coming away, said stop a moment, I will speak to Mr. M....., (who is a constable, and also a gingerbread baker, and with whom this deponent had previous dealings,) and he will be a friend to you, deponent then returned home. And this deponent further saith, that she again went to the-office at eight o'clock in the evening of the [228] last mentioned day, and saw S..... who immediately took deponent to the Coach and Horses, when she asked him (S.....) for the note, but he replied, Mr. H.... would give it to deponent in the morning, for he did not like to do it himself, as he considered it more prudent for Mr. H.... should give it to deponent than himself. That deponent remarked, that he gave her a deal of trouble, to which he replied, she should be well paid for it. And this deponent saith, that on Wednesday, the nineteenth day of April, deponent, about nine o'clock in the morning, again went to the-office and saw S....., who wished deponent a good morning, and told her to go to Mr. H....'s house, which deponent did, but was informed that he was at the office, No. 14....-street, whither to deponent went, and asked for Mr. H...., and was informed he was engaged; that after waiting a few minutes he came and called deponent upstairs, and asked her if she had brought the letter, on which she informed him that she had not, for her husband was afraid she should be brought into some trouble unless Mr. H.... would give her a note; that Mr. H.... thereupon said, I cannot, for it would be very imprudent: but your husband may come down with you and S..... at either twelve today, seven this evening, or nine tomorrow morning, when I will satisfy your husbands' mind. And this deponent further saith, that Mr H.... asked deponent what she was going to do with her basket which she held in her hand, and on her replying that she was going to buy some meat, he said to deponent, you have not perhaps got much money, that deponent replied, but one shilling, and H.... then gave deponent four shillings, and said to deponent, when it is all settled, I don't know but your husband may have a pension from Prince Regent, for by your swearing it will save many thousands of lives. And this deponent further saith, that in the course of the conversation, which she then had with Mr. H...., she told him her clothes were all fast, to which he (Mr. H....) replied, you shall go to London and have plenty of money to make you comfortable, and you shall be removed to some other place after you have sworn. And this deponent further saith, that at twelve o'clock on the same Wendesday, she went, accompanied by her husband, William Pearson, to the-office, and saw S....., who said to deponent, William Pearson, this is your husband (pointing to the said William Pearson) to which deponent said yes; on which S....., said to deponent's husband, have you got that letter with you, who answered, no, but that he would bring it up after he had seen H..... S..... then said, I cannot go with you now, but you can both go to Mr. H..... And deponent further saith, that as she and her said husband were going to Mr. H....'s house, deponent saw Mr. H.... and another gentlemen walking on the other side of the way, and he, H...., called to deponent, and when deponent had crossed the street to him, he gave directions to his servant, who was at the door of his house, to shew deponent and her husband upstairs. And deponent saith, that in a very short time Mr. H.... came in and asked deponent if that was her husband, and on deponent's replying yes, said to deponent's husband, you may make yourself perfectly easy on the point, for I give you my word and honour as a gentleman, you shall come to no harm if you let her do as we wish her to do. And deponent further saith, that her

husband then asked Mr. H.... to let him hear what this deponent [229] was required to swear to Mr. H.... said it must be finished, and then you shall hear it read. And deponent saith, Mr. H.... told this deponent to come on the following morning at nine o'clock, and not later, and to bring the letter with her, but this deponent did not attend such appointment. And this deponent most positively saith, that she never was at Mr. Johnson's house at Smedley, but once, and that was on the morning of the sixteenth of August last, when the deponent went for the purpose of asking Mr. Hunt's assistance to recover some property, which deponent considers herself to be entitles to, and deponent saith, that was her sole object in so going to Mr. Johnson's. And deponent saith, that she had no conversation there with Mr. Hunt or any other person whomsoever, except about the recovery of said property; and that upon deponent making such application to Mr. hunt, he stated that he was not a solicitor and could not do anything for her, although he was sorry, he could not render her any assistance. And this deponent further saith, that on Friday, the twenty-first day of April last, about eleven o'clock in the forenoon, two gentlemen called upon this deponent and asked her is her name was not Pearson, and if she did not know Mr. Hunt, and had not called upon him at Mr. Johnson's house; to which question this deponent answered in the affirmative; and after asking this deponent's business with Mr. Hunt, which she declined, answering. Observing that she did not know who they were: they said, this deponent must not be afraid, for they were friends to the magistrates of Manchester, and were sent to talk to this deponent, and to know if she would stick to the gentlemen against Hunt and Johnson; to which this deponent replied, you want me to swear people's lives away, and to get me into the New Bailey; but they said no, far from any such thing, we will take care that you are protected from all trouble, and we will put you into any situation that you wish; and asked this deponent what situation she would wish; and upon her saying that she should like a public house, they say she should have one, and a good one too. Saith, that she asked them what their names were, and where they lived, that she might call upon them; to which they replied, that this deponent should know that, when it was all settled, and they hoped that she would do everything that Mr. H.... wished her to do, for it would be to her own benefit. That they then whispered to one another, but this deponent does not know what was said. After which they went on the outside of the door, and one of them turned back and said, (addressing deponent) Mrs. Pearson, will you accept a small present of money; but this deponent replied, no, Sir, I dare not take any from you, for it my husband were to know, he would be very angry with me, and say that you have given it to me to perjure myself. That they then desired deponent to step up to Mr. H....'s office, at four o'clock, for he (Mr. H....) wanted to see her for something very particular, which she, this deponent, promised to do. Saith, that previous to their going away, they particularly requested this deponent not to mention anything about it, for if she did, perhaps some would let that rascal Hunt know of it, who was trying to get a new trial, and he would then bring the magistrates of Manchester into disgrace. Saith, that about three o'clock in the afternoon on the same day, Mr. H....'s clerk came to this deponent's house and told her she must go to his master's office [230] immediately, and she told him that she would be with him as quick as possible. And this deponent saith, that on her arrival at the office she was shewn upstairs to Mr. H...., who said Mrs. Pearson, I have been very full of trouble to see you, on which this deponent asked him if he had not sent two gentlemen down to her house today; and he replied no, I did not; but if there have been any they will be friends of yours. He then said, I think we had better begin to write, and get this business forwarded as soon as we can; when this deponent replied that she hoped he would excuse her then as she wanted to take her husband's tea, as he was very poorly. Upon which he said, if you go now you

must promise to see me at nine or half-past tomorrow morning. But this deponent not attending as she had promised, Mr. H....'s clerk came to her on the Saturday morning, about eleven o'clock, and said she must go to Mr. N.....'s office immediately, and take Mr. S..... with her to Mr H....'s office; but this deponent begged they would excuse her till Monday morning, for she had been very unwell during the night. And this deponent further saith, that on Monday, the twenty-fourth of April, she went to N.....'s office, where she saw Mr. S....., who said, well Mrs. Pearson, you are using Mr. H.... very ill, and the gentleman likewise, to which this deponent said that she could not help it for she had been very ill and she could not come, and this deponent then asked S..... if he would go with her to H....'s office, and he replied no, for he was very busy, it being the King's birthday; but he wished deponent to go by all means. And this deponent further saith, that she went up to Mr. H....'s office, but he not being within she went to his house, where she saw Mr. H.... who exclaimed, Oh dear, Mrs. Pearson, I have no time to talk to you now, but you must step up tomorrow morning, about eleven o'clock, and there is a great gentleman from the country, who will be a great friend to you, whom Hunt has used very ill at York, he will meet you with two or three more at my office, and he (H....) added, don't you give me the trouble of sending for you. And this deponent further saith, that Mr. H... cautioned her against saying anything more to S....., he being nothing more than a servant, and he had already made himself too busy, and they did not wish him to know anything more of so serious a business, and on this deponent observing to H.... that she was afraid God would never forgive if she did such a thing, he replied, that she would be doing a good thing, for she would be the means of saving the lives of many thousands, besides saving the honour of the Manchester magistrates, whose character had been disgraced by that villain hunt, whom you must think is a very bad man, for he does not live with his wife. And this deponent further saith, that, on the afternoon of Monday she went to the-office, and saw S..... who told her that the affair had been told to a gentleman that Hunt had used ill, and that is she would complete the order as they wished her, it would hang that damned scoundrel Hunt, and that the gentleman had said that a hundred pounds would be no object, and if deponent and her husband did not approve of living in Manchester there should be a comfortable cottage provided for the, in the country, upon which he clapped her upon the back, and said these are promises for you, if I had half of these promises made to me, I would swear [231] anything against the damned rascal. And upon this deponent saying that she should like to see those gentlemen, he said she must defer till after the affidavit was made, and she would then see them at the New Bailey. And this deponent further saith, that she went to Mr. H....'s on the Tuesday morning, and saw a gentleman writing in the office, who said, I suppose you expected to see more gentlemen here, but you must excuse them for they were so fatigued yesterday on account of the birthday that they left orders with me: he then said that there was a gentleman from the country had left deponent a very handsome compliment, at the same time laying his hand upon a parcel which appeared to be bank notes. Deponent then asked, if he wanted her for anything more, to which he replied, no, not till tomorrow morning, at about twelve o'clock, a quarter before or a quarter after, and at that time you must be sure to attend at the New Bailey, and there will be a person who will know you, and he will show you into the counsellor's room, where there will be some gentlemen to attend you, and swear you to the affidavit. I am now drawing up, and you will be brought back to Mr. H....'s office for the compliment that is left for you. And this deponent further saith, the above mentioned gentleman also told her that she must be kept in tow for three or four days for the purpose of getting her story well fixed in her memory, that she might make no blunders upon her examination. He then said we have got the name of Pearson, but we want your Christina name,

what is it? And this deponent answered Matilda, which he wrote down upon a slip of paper. Deponent then left the office.

MATILDA PEARSON
her x mark

Sworn at Manchester aforesaid, the 12th day
of May, 1820, the affidavit having been
carefully read over to deponent (who
perfectly understood the same), by and
before me.

J.R. ATKINSON

A Correct Copy.