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Forged in Fire:

Unraveling Columbia University's Historical Ties to Slavery Through the Trials and Tributes of Daniel Horsmanden

Introduction

This paper delves into the intricate historical ties between Daniel Horsmanden, a prominent judicial figure in colonial New York, and Columbia University, formerly known as King's College. The exploration is centered around two key elements: Horsmanden's noteworthy bequest of £500 to King's College in 1777 and his consistent attendance at the institution's trustee meetings during the 1760s, as well Horsmanden's significant role in the infamous New York Conspiracy of 1741 trials. Unraveling the motivations behind Horsmanden's philanthropy and his active engagement with the college's governance provides a lens through which to examine the complex intersections between individuals of influence, philanthropy, and the university's potential ties to the institution of slavery in 18th century New York.

While Daniel Horsmanden's involvement in the New York Conspiracy of 1741 trials is undoubtedly troubling for his personal legacy, its connection to Columbia University raises broader concerns about the institution's historical entanglement with slavery. As a central figure in a series of trials marked by questionable legal practices, forced confessions, and a climate of fear, Horsmanden's legacy is tainted with the specter of injustice and exploitation of marginalized

communities--he was also, notably, deeply involved with Columbia University (then King's College) some of its earliest stages. For Columbia, being linked to a historical figure involved in a contentious episode raises some obvious ethical concerns. The legacy of Horsmanden's role in the 1741 conspiracy trials when viewed in tandem with his contributions to the university should challenge us to engage in a more nuanced dialogue about ethics, justice, and the responsibility of institutions to critically assess their past associations.

First serving as an Associate Justice, and eventually Chief Justice of the Supreme Court of Judicature, Horsmanden played a pivotal part in the proceedings that followed a series of fires and rumored plots in New York City. The trials, chronicled in Horsmanden's own narrative, saw numerous individuals, both enslaved and free, accused of planning a rebellion aimed at burning the city and overthrowing the colonial government. Over 150 Black men were imprisoned and 30 lost their lives, largely as a result of Horsmanden's actions [Faucquez 219].

Daniel Horsmanden and His Conspiracy

In the spring of 1741, smoke began to fill the skies over New York City (and where there is smoke, there is, of course, usually fire). This ominous prelude marked the inception of one of the most consequential events in the city's history—the trials for the alleged New York Conspiracy of 1741. At the heart of this tumultuous period was Daniel Horsmanden, a prominent figure in the legal and judicial landscape of colonial New York. As Third Associate Justice of the Supreme Court of the Province of New York, Horsmanden found himself thrust into a maelstrom of fear and suspicion as rumors of a widespread conspiracy, involving enslaved individuals, poor whites and free Blacks swept through the city.

The trials unfolded against a backdrop of simmering racial tensions and economic disparities in colonial New York. The city, an ever-growing hub of commerce and trade, held a

mix of diverse communities, including a significant enslaved population--at the time, an estimated 20% of New York City's population was enslaved [Launitz-Schurer, 137]. New York contained the highest number of enslaved individuals north of Charleston, South Carolina [Berlin 63; Lydon 375]

In 1744, Daniel Horsmanden published a journal meant to detail all of the evidence (however dubious) he collected during his investigation for the trials. The trials were characterized by a climate of fear and suspicion, exacerbated by whispers of a slave revolt and the alleged involvement of enslaved and free Black individuals in a conspiracy to overthrow the colonial authorities. Horsmanden's *A Journal of the Proceedings In the Detection of the Conspiracy Formed by some White People, in conjunction with Negro and other Slaves, for burning the City of New York in America and murdering the Inhabitants*", penned in 1744 (roughly three years after the events of the conspiracy), though problematic, stands as the most comprehensive historical document attempting to encapsulate he tumultuous events following the alleged New York Conspiracy of 1741. The narrative, compiled and written by Horsmanden himself, provides a meticulous, if likely embellished (when not wholly invented) account of the interviews and legal proceedings that unfolded during and after the alleged conspiracy.

In the journal, Horsmanden details the accusations, examinations, and testimonies presented during the trials, offering a window into the prevailing beliefs, biases, and anxieties of colonial New York, including those particular to Daniel Horsmanden himself. Scholars and historians have scrutinized the journal for its inaccuracies, embellishments, and role in perpetuating racial stereotypes and contributing to the perpetuation of fear and suspicion among the populace [Scott 43]. By Horsmanden's hand, what began as smoke from the burning of buildings concluded with smoke from the burning of bodies.

Slavery in 18th Century New York: A Brief Background

The institution of slavery in New York underwent significant transformations throughout the 18th century, reflecting broader societal shifts, economic developments, and changing attitudes towards human bondage. In the early 1700s, slavery was already well-established in the colony, with enslaved individuals contributing to various aspects of economic activity such as agriculture, trade, and domestic labor.

During the first half of the century, the enslaved population in New York City steadily increased, driven by the demand for labor in expanding industries and a failure to attract large-scale white immigration [Account of imported Negros; Lydon 381]. Enslaved individuals worked on farms in the surrounding countryside and played essential roles in the bustling urban economy. The Dutch West India Company, which originally colonized New Netherland (later New York), had introduced slavery in the region in the 17th century [Dennis 5].

As the 18th century progressed, so did the economic and social landscape of New York. The city became a hub of commerce, trade, and cultural exchange. This growth had implications for the institution of slavery, with enslaved individuals becoming integral to the prosperity of the colony. The mid-18th century marked a period of heightened slave importation, and the demographics of New York shifted accordingly. The city's economic activities, including shipping, trade, and construction, relied heavily on enslaved labor [Lepore 9].

The 1712 slave revolt in New York City had a significant impact on the formulation and reinforcement of slave codes, reflecting the authorities' efforts to prevent future uprisings and tighten control over the enslaved population. The revolt, which occurred on the night of April 6, 1712, involved a group of enslaved individuals setting fire to a building and attacking whites as

they fled the flames [Faucquez 204, Hunter 340]. In the aftermath of the rebellion, the colonial government implemented stricter slave codes aimed at suppressing potential resistance and maintaining social order [Faucquez 220]. The New York provincial assembly passed an *Act for Preventing, Suppressing and Punishing the Conspiracy and Insurrection of Negroes and Other Slaves* in December of 1712, which notably permitted slaveowners to punish their slaves "at Discretion".

One notable change in the slave codes following the 1712 revolt was the imposition of harsher restrictions on the movements and activities of enslaved individuals. Authorities sought to limit their opportunities for congregation, communication, and coordination, fearing that gatherings could lead to further unrest. Enslaved individuals faced more stringent curfews, and measures were implemented to restrict their ability to assemble without supervision. Notably, the 1741 conspiracy was marked by suspicions that slaves, freemen, and working-class whites had been meeting in violation of the 1712 codes [Lepore 53].

Additionally, the 1712 revolt prompted the colonial government to enact more severe punishment for enslaved individuals found guilty of participating in or plotting rebellions. The penalties for engaging in violent acts or conspiracies against whites were intensified, often resulting in brutal executions or harsh physical punishments. These measures were intended not only as deterrents but also as mechanisms to assert control and discourage resistance.

The slave codes also addressed the issue of education and literacy among the enslaved population. Restrictions on the education of enslaved individuals were tightened, with laws prohibiting them from learning to read and write. This was done in part to limit their access to information and ideas that might foster dissent.

The changes in slave codes following the 1712 revolt reflected the anxieties of colonial authorities regarding the potential for insurrection. By enacting stricter regulations and more severe punishments, the government aimed to quell any aspirations of rebellion among the enslaved population and maintain social stability. These measures set the stage for subsequent developments in the institution of slavery in New York and contributed to the complex history of enslaved individuals seeking freedom and justice in the region.

Daniel Horsmanden's Role, Influence and Legal Attitudes as a Justice

During Daniel Horsmanden's time as Chief Justice of the Supreme Court of Judicature in the Province of New York, the role of the Chief Justice involved presiding over the highest court in the colony and overseeing significant legal matters. The Supreme Court of Judicature held jurisdiction over both civil and criminal cases and was a key institution in maintaining law and order in the province [Rosen, 215].

In the case of Daniel Horsmanden, one of the most notable events during his tenure was his involvement in the New York Conspiracy of 1741 trials. Horsmanden, as Chief Justice, presided over these trials, which were marked by allegations of a supposed slave conspiracy to burn the city and were controversial due to the harsh punishments meted out. Horsmanden's role in these trials has been a subject of historical scrutiny and debate.

It's important to note that the Chief Justice's duties extended beyond specific cases, encompassing broader responsibilities tied to maintaining the legal order in the province. The office held considerable influence in shaping the legal landscape and ensuring justice, albeit within the context of the times and prevailing colonial attitudes.

Daniel Horsmanden and John Peter Zenger were associated with one another in the context of a landmark legal case, *The People v. John Peter Zenger*. The case, which unfolded in colonial New York in 1735, is renowned for its significance in establishing the principle of freedom of the press in American jurisprudence. John Peter Zenger, a German-American printer, and journalist, published The New-York Weekly Journal, a publication was critical of the colonial governor, William Cosby, and his administration. In response to the perceived libel, Zenger was arrested and charged with seditious libel. Daniel Horsmanden played a notable role in the legal proceedings as one of the judges presiding over the trial. Horsmanden was aligned with the colonial authorities and the governor. Despite this alignment, the defense team, led by Andrew Hamilton, argued that truth should be a defense against charges of libel [Alexander, 70].

In a landmark decision, the jury acquitted Zenger, marking a significant moment in the development of press freedom in the American colonies. The case established the precedent that truth could be used as a defense in libel cases and contributed to the eventual recognition of the freedom of the press as a fundamental right. While Horsmanden and Zenger were connected through the legal proceedings, their roles were adversarial, with Horsmanden representing the colonial establishment and Zenger defending the principles of a free press.

The landmark Zenger trial, a pivotal moment in colonial American history, played a consequential role in motivating Daniel Horsmanden to document his observations in his journal, concerning the events of 1741 [Lepore 18]. Horsmanden, deeply affected by the legal and political dynamics surrounding the Zenger case, felt compelled to record his perspective on the subsequent events in New York. The Zenger trial, renowned for its implications on freedom of the press, served as a catalyst for Horsmanden's commitment to documenting what he perceived

as another significant conspiracy—alleged plans for the burning of New York and the murder of its inhabitants—which unfolded against the backdrop of racial tensions and social anxieties.

Enslavement, Attendance and Endowment

In the aftermath of the tumultuous trials of 1741, Daniel Horsmanden's trajectory in colonial New York continued to grow his power and influence. Ascending to the position of Chief Justice, Horsmanden found himself at the pinnacle of the legal hierarchy of New York, wielding significant influence over the administration of justice. Beyond the courtroom, his engagement with the societal fabric also began to extend to academia. Throughout the 1760s, Horsmanden, now a seasoned jurist, became a regular attendee of the King's College trustee meetings. These gatherings, known as the meetings of the Governors, provided a unique intersection between the realms of justice and education, marking a distinct phase in Horsmanden's multifaceted involvement with the evolving landscape of colonial New York.

Daniel Horsmanden's consistent attendance at the monthly trustee meetings for King's College during the 1760s underscores his ongoing engagement with the institution and its governance. These trustee meetings served as crucial forums for decision-making, policy formulation, and the overall administration of the college. Horsmanden's participation in these gatherings speaks to his continued commitment to the well-being and development of King's College.

As a Governor, Horsmanden likely contributed his legal acumen and experience to discussions related to the college's policies, finances, and academic matters. His presence at these meetings would have provided valuable insights, especially given his background as a former Chief Justice and his extensive involvement in legal and public affairs.

The 1760s were a period of transition and growth for King's College, and the decisions made during these trustee meetings would have had a lasting impact on the institution. Horsmanden's active involvement in these discussions reflects a dedication to shaping the future of the college and maintaining its prominence within colonial society.

Horsmanden's donation in 1777 occurred during a time of great upheaval when the American colonies were fighting for independence [Jones, 180-181]. The fact that Horsmanden, who had a history of involvement in prosecuting individuals during the New York Conspiracy of 1741, chose to contribute to the university suggests a complex interplay of motivations. It could be seen as a recognition of the changing political landscape, an acknowledgment of the importance of education even amidst revolutionary turmoil, or a personal statement on his part. There are several indications that the activities of King's Colleges governors were not suspended during the War of Independence, and there is also evidence students were solicited for enrollment in 1777, the same year Daniel Horsmanden outlined his donation to the university in his will [Minutes, 17].

Horsmanden's Donation to Columbia: Unpacking the Legacy

As a distinguished legal figure, Horsmanden's career was inherently entwined with the legal frameworks governing slavery in colonial New York. Serving as Chief Justice during a time when slavery was integral to the economic and social fabric, Horsmanden's legal decisions may have influenced the maintenance and reinforcement of slavery as an institution.

Moreover, Horsmanden's legal practice likely involved related to enslaved individuals and their status, providing him with financial gains directly tied to the exploitation of human

labor. The legal machinery of the time permitted financial benefits for those engaged in facilitating slave transactions or resolving disputes involving enslaved individuals.

Indirectly, Horsmanden's wealth could also be linked to the broader economic landscape shaped by slavery. Investments in businesses that profited from slave labor, such as plantations or enterprises reliant on cheap, enslaved workforce, could have contributed to his financial prosperity. The economic prosperity of the region, built on the backbone of slave labor, further underscores the potential indirect ties between Horsmanden's wealth and the institution of slavery.

Unpacking Horsmanden's financial legacy thus involves acknowledging the intricate interconnections between his legal career, economic ventures, and the prevailing system of slavery, both directly and indirectly influencing his substantial donation to Columbia, then King's College. This exploration forms a crucial aspect of understanding the complex legacy left by Horsmanden and its implications for the institution.

In 1777, King's College, later to be known as Columbia University, found itself caught in the tumultuous currents of the American Revolutionary War. The institution, established in 1754, had been a prominent center for education and intellectual discourse in colonial New York. However, as hostilities escalated between the American colonies and British forces, the college underwent profound changes reflective of the ideological and political transformations sweeping through the region [McCaughey, 44-45].

The war posed significant challenges for the operations of King's College. The political climate of rebellion against British rule and the fervor for independence reverberated within its walls, leading to disruptions in regular academic activities [Minutes, 16]. The college struggled to maintain its traditional functions as students and faculty became increasingly involved in the

revolutionary cause. The departure of loyalist scholars and the enlistment of students in the Continental Army further strained the institution's ability to operate seamlessly.

Financial difficulties compounded the challenges. With the disruption of regular funding sources and the economic strains of wartime conditions, King's College faced financial instability. The war's impact on enrollment, donations, and endowments added to the financial woes, necessitating adaptability and resilience for the institution to weather the storm.

Amidst this backdrop of war and uncertainty, the £500 donation from Daniel Horsmanden in 1777 assumed particular significance. Horsmanden's contribution arrived at a crucial juncture when the institution grappled with the dual pressures of war-induced transformations and financial strain. The complexities of the era set the stage for a nuanced understanding of Horsmanden's philanthropy and its implications for the university's resilience and adaptability during a transformative period in American history.

During the Revolutionary War in New York City, the institution of slavery experienced significant upheaval and transformation. The conflict itself, driven by ideals of liberty and equality, spurred debates and discussions that inevitably reached the enslaved population. Many enslaved individuals sought opportunities for freedom by aligning themselves with the British forces, who promised emancipation to those who sided with the Crown [Dunmore]. Simultaneously, American revolutionary ideals and the rhetoric of liberty influenced some enslaved individuals to seek freedom by supporting the patriot cause. The dynamics of war disrupted traditional systems, and the movement of both enslaved and free Black populations within and beyond the city reflected the complexities of this period.

Major figures at Columbia University, or King's College as it was known at the time, were likely affected by the social and political currents of the Revolutionary War. The

ideological underpinnings of the revolution, emphasizing liberty and justice, could not be divorced from the institution's own internal dynamics, including its ties to slavery. Key figures associated with the university, many of whom were influential in both political and academic spheres, might have grappled with the contradictions between their commitment to revolutionary ideals and the institution's historical connections to slavery. The war served as a crucible for challenging societal norms, and individuals affiliated with the university were likely confronted with profound questions about the institution's role in a changing social and political landscape. The impact of the Revolutionary War on the institution of slavery in New York City would have reverberated within the halls of King's College, shaping the perspectives and actions of its major figures.

As a notable figure born in Britain and serving as Chief Justice in colonial New York during this pivotal period, Horsmanden traversed a complex political and social landscape. The absence of clear records regarding his political leanings makes it challenging to conclusively determine his stance on loyalty to the British Crown or alignment with the revolutionary cause. Given his influential role in the legal and judicial spheres, Horsmanden's actions and decisions during the war might reflect a degree of political neutrality or a careful navigation of the shifting allegiances in the city. The Revolutionary War, marked by intense ideological divisions, prompted individuals in positions of authority, particularly those with ties to Britain, to make nuanced choices shaped by pragmatic considerations rather than rigid ideological adherence. Approaching historical figures like Horsmanden requires recognizing that political allegiances were multifaceted and often influenced by practical considerations rather than straightforward alignment with either loyalist or patriot sentiments. Horsmanden’s role as Chief Justice and his

significant contribution to the establishment of Columbia University—the evolution of King's College—paint a complex picture.

Conclusion

The exploration of Daniel Horsmanden's legacy, intertwined with Columbia University's early history and the institution of slavery, reveals a complex tapestry of historical forces and ethical considerations. Horsmanden's role in the New York Conspiracy of 1741 trials, marked by controversy and harsh penalties, adds a layer of complexity to his association with Columbia University, then King's College. The £500 bequest from Horsmanden's estate in 1777 raises questions about the entanglement of wealth accrued in part from his legal career with a system that perpetuated human bondage, as well as Horsmanden’s regularly monthly involvement with the Corporation of Governors.

Columbia University, like many institutions of its time, grappled with the pervasive influence of slavery on its development. The financial contributions from individuals with ties to the legal system, such as Horsmanden, underscore the intricate connections between educational institutions and the economic structures that sustained slavery. This financial support, while instrumental in the university's growth, simultaneously perpetuated a system built on the labor of enslaved individuals. The juxtaposition of Horsmanden's legal career, his donation to Columbia, and the broader historical context of slavery in New York invites critical reflection. It prompts us to consider the ethical dimensions of commemorating figures whose legacies are entwined with oppressive systems. This examination is essential for understanding the complex intersections of power, wealth, and education in the formation of early American institutions.

Daniel Horsmanden was not only a steadfast presence in colonial New York's legal sphere, but also demonstrated unwavering commitment in the 1760s as he diligently attended the

meetings of the Governors of King's College, eventually donating part of his estate even as the institution scaled back its operations during the Revolution. As we confront this history, it is incumbent upon us to acknowledge the uncomfortable truths embedded in the origins of institutions like Columbia University. Only through a comprehensive understanding of these historical nuances can we actively work towards fostering inclusivity, justice, and a commitment to dismantling the legacies of oppression that persist in our institutions today.

Sources (To be revised/reordered)

1. “The Last Will and Testament of Daniel Horsmanden, February 5, 1777” in Abstracts of Wills NYHSC 33 (1900) 57-58. https://babel.hathitrust.org/cgi/pt?id=coo.31924067113534&seq=77
2. A Journal of the Proceedings In the Detection of the Conspiracy Formed by some White People, in conjunction with Negro and other Slaves, for burning the City of New York in America and murdering the Inhabitants (1744). Schomburg Center for Research in Black Culture, Manuscripts, Archives and Rare Books Division, The New York Public Library. "Title page" New York Public Library Digital Collections. https://digitalcollections.nypl.org/items/510d47e2-c5b3-a3d9-e040-e00a18064a99
3. Horsmanden, Daniel. The New-York conspiracy, or, A history of the Negro plot, with the journal of the proceedings against the conspirators at New-York in the years -2. New-York: Printed and published by Southwick & Pelsue,no. 3, New-street, 1810. Pdf. https://www.loc.gov/item/01014322/.
4. Early Minutes of the Trustees: 1755-1770, Volume 1. Columbia University. Minutes of the Board of Trustees; University Archives, Rare Book and Manuscript Library, Columbia University Libraries. https://archive.org/details/earlyminutesoftr1175colu/page/n9/mode/2up
5. Eric Foner, Columbia and Slavery: A Preliminary Report (Columbia University and Slavery Seminar, 2015). https://academiccommons.columbia.edu/doi/10.7916/D8XP8MV0
6. Launitz-Schurer, Leopold S. “Slave Resistance in Colonial New York: An Interpretation of Daniel Horsmanden’s New York Conspiracy.” Phylon (1960-), vol. 41, no. 2, 1980, pp. 137–52. JSTOR, https://doi.org/10.2307/274967.
7. Berlin, I., & Harris, L. M. (2005). Slavery in new york New Press. Retrieved from http://ezproxy.cul.columbia.edu/login?url=https://www.proquest.com/books/slavery-new-york/docview/36562595/se-2
8. Lepore, Jill. “The Tightening Vise: Slavery and Freedom in British New York.” In Slavery in New York, ed. Ira Berlin and Leslie M. Harris
9. McAdam, David., ed. A History of the Bench and Bar of New York. New York, 1897.
10. Whitfield Jenks Bell. Patriot-Improvers: Biographical Sketches of Members of the American Philosophical Society, 1743-1768. Philadelphia, 1997.
11. Henneton, L., & Roper, L. (Eds.). (08 Apr. 2016). Fear and the Shaping of Early American Societies. Leiden, The Netherlands: Brill. Chapter 9 “A Bloody Conspiracy”: Race, Power and Religion in New York’s 1712 Slave Insurrection” Anne-Claire Faucquez. https://doi-org.ezproxy.cul.columbia.edu/10.1163/9789004314740
12. Jill Lepore. 2006. New York Burning : Liberty, Slavery, and Conspiracy in Eighteenth-Century Manhattan. Vol. First Vintage books edition. New York: Vintage. https://search-ebscohost-com.ezproxy.cul.columbia.edu/login.aspx?direct=true&AuthType=ip&db=nlebk&AN=720049&site=ehost-live&scope=site.

13. Documents Relative to the Colonial History of the State of New York, 15 vols. (Albany, 1853–1887), 5:349–350 (about the 1712 “bloody conspiracy”)
14. A Brief Timeline of Columbia University in the City of New York. 1754-1803 https://www.columbia.edu/content/university-history
15. Scott, Kenneth. The Slave Insurrection in New York in 1712. New-York Historical Society quarterly, 1917-1980 › NYHS v45 n01, Quarterly, January 1961 › Chapter 2 https://digitalcollections.nyhistory.org/islandora/object/islandora%3A26702#page/1/mode/1up/search/horsmanden
16. New York (State)., Northrup, A. Judd (Ansel Judd)., Johnson, W. H. (William Henry)., Lincoln, C. Zebina., New York (N.Y.)., Albany (N.Y.)., New York (State)., New York (State). Commissioners of Statutory Revision. (1894). The colonial laws of New York from the year 1664 to the revolution ... Albany: J.B. Lyon, state printer.
17. Linder, Douglas (2009) The "Negro Plot Trials": An Account http://law2.umkc.edu/faculty/projects/ftrials/negroplot/account1741plot.html
18. Schomburg Center for Research in Black Culture, Manuscripts, Archives and Rare Books Division, The New York Public Library. (1726). Number of Negroes imported from 1701 - 1726; An acco't of what Negro slaves have been imported into his Majesties Province of New York as taken from the Custom House Books between the year 1701 & this present year 1726 Retrieved from https://digitalcollections.nypl.org/items/510d47df-fca7-a3d9-e040-e00a18064a99
19. Lydon, J. G. (1978). New York and the Slave Trade, 1700 to 1774. *The William and Mary Quarterly*, *35*(2), 375–394. https://doi.org/10.2307/1921840
20. Alexander, James (1756) A Brief Narrative of the Case and Trial of John Peter Zenger
21. Jones, Thomas. History of New York during the Revolutionary War : and of the leading events in the other colonies at that period, 1730-1792. NYHS, 1897. https://hdl.handle.net/2027/uc1.b4519332
22. Humphrey, David C. From King's College to Columbia, 1746-1800. New York: Columbia University Press, 1976
23. McManus, E. J. (1966). A history of negro slavery in new york Syracuse University Press. Retrieved from http://ezproxy.cul.columbia.edu/login?url=https://www.proquest.com/books/history-negro-slavery-new-york/docview/37823269/se-2
24. Maika Dennis (2020) To “experiment with a parcel of negros”: Incentive, Collaboration, and Competition in New Amsterdam’s Slave Trade. *Journal of Early American History*.
25. Governor Robert Hunter to the Lords of Trade (23 June 1712) E.B. Callaghan, ed. Documents Relative to the Colonial History of the State of New York, vol. V.
26. McCaughey, Robert A. Stand, Columbia: A History of Columbia University. Columbia University Press, 2003. JSTOR, https://doi.org/10.7312/mcca13008

27. Rosen, D. A. (1987). The Supreme Court of Judicature of Colonial New York: Civil Practice in Transition, 1691-1760. *Law and History Review*, *5*(1), 213–247. https://doi.org/10.2307/743941
28. Lord Dunmore (1775). A Proclamation. Document Bank of Virginia https://edu.lva.virginia.gov/dbva/items/show/268.