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Following the Privy Council's decision to refer the CASE back to the Court of Arches (D 4:84; D 7: 115-124), Pierce was permitted a new hearing provided he paid certain court costs (D 7:85). For financial reasons, he had to allow the case to collapse legally. He, however, continued his cause publicly through the publication of pamphlets, beginning with a version of his petition to the House of Commons when the House discharged it without action largely because of its slanderous and scandalous language and content (D 6:173).

During the next few years he wrote a number of pamphlets on religious and political matters; some of these ran into numerous editions both in England and America. Most of this writing was done in the decade of the eighteen-fifties. Later publications, especially in the eighteen-seventies, were mostly extracts or republication of the originals. This article will deal primarily with the original flurry of pamphlets.

Other writers, usually anonymous, wrote pamphlets refuting and condemning Pierce. Two of these have been included in this study, as well as one written in support of his case.

In order to provide a setting for the better understanding of this "trial by press," section A of this study will present a portrait of Pierce's character and career as culled from the <u>Documentation Presented</u> by the Historical Commission for the Cause and supported, as far as possible, by authoritative writings of objective, outside witnesses to the period. Section B will present a study of excerpts from Pierce's pamphlets in juxtaposition to samples of his writing at the time of his resignation as an Episcopalian minister and his early days as a Catholic. In the last segment of this section Cornelia's reaction to Pierce and to the sorrow and anguish he brought her will be portrayed.

* See "Select Bibliography of Pierce Connelly" immediately following for the titles studied and for the key to the short titles used for reference and footnotes here and in the continuation which will appear in the next issue of Source.

Select Bibliography of Pierce Connelly

Case of the Rev. Pierce Connelly. Second edition,
with preface and supplement. London: Thomas Hatchard,
1853. viii, 41p. (D 8:99-144) /Note: Commentary in
Cornelia's hand in the margins of this copy/
(Case of . . . P. Connelly)

Connelly, Pierce, 1804-1883

Address in the Cathedral of Baltimore. (D 8:172-182)

(Address, 1842)

- London: Hatchard, 1880. (Cardinal Newman)
- for the use of the laity. Extracted from the moral theology of the Romish clergy. By Pascal the younger /pseud/. London: Thomas Bosworth, 1851. 64p.

 (Cases of Conscience)
- "Cases of Conscience," with a Reply. By Pascal the younger /pseud/. . . London: Thomas Bosworth, 1851. 36p. /"Wiseman versus Pascal the Younger" at top of title page/ (Church of Rome's defence . . . Reply)
- but political: or, words of warning to the English people. London: T. Hatchard, 1852. 36p. (D 8:25-43) (Coming struggle with Rome)
- Domestic emancipation from Roman rule in

 England. A Petition to the honourable House of Commons... with notes. London: T. Hatchard, 1852.

 2 p.1., 5-15pp. (D 8:14-21) /Note: The original was submitted to the House of Commons 28 April 1851 (D 6: 161-164): printed for "use of members only."/

 (Petition to H of C, 1851 or 1852, as pertinent)
- London: Protestant Evangelical Mission and Electoral Union, 1874. (England's coming struggle)
- . "A Farewell Sermon," preached at Trinity Church, Natchez, Sept. 6, 1835, as reported in the Catholic Herald, Philadelphia, Thursday, January 14, 1836. (D 3:24-38) (Farewell sermon)
- Bishop of Tennessee, on the resignation of the rectorship of Trinity Church, Natchez," as reported in the Catholic Herald, Philadelphia, Thursday, January 7, 1836. (D 3:2-17) (Letter of resignation)

- . The Madiai-Millions: a letter to the Right

 Hon. the Earl of Aberdeen. 5th ed. London: T.

 Hatchard, 1853. (The Madiai)
- oaths of allegiance, a security for national independence. A letter to J. C. Colquhoun, Esq. London: T. Hatchard, 1854, 19p. (Oaths of allegiance)
- . The Pope in England: or, who shall turn him

 out? Three letters to Sir W. Broadlands. By Pen Cler
 Jocelyn /pseud/. 2nd ed. London: T. Bosworth, 1853.

 (Pope in England)
- . The Pro-Popery Conspiracy. A fourth and fifth letter to Sir W. Broadlands. By Pen Cler Jocelyn. London: T. Bosworth, 1853. (Pro-Popery conspiracy)
- Colton . . . Genius and Mission of the Protestant
 Episcopal Church in the United States of America.
 London: J. S. Hudson, 1853. (Preface, 1853)
- times. Reason and religion with other sermons for the London: T. Bosworth, 1877. (Reason and religion)
- Reasons for abjuring allegiance to the See of Rome. London: Protestant Evangelical Mission and Mission and Electoral Union, 1851. (Reasons for abjuring)
- memorial presented by the Rev. Noah H. Schenck, and others, to the . . . presiding bishop of the Protestant Episcopal Church in the United States. London: Bush, 1871. (Terms of re-union)
- Reply to Reasons for abjuring allegiance to the See of Rome. A letter to the Rev. Pierce Connelly. London:
 Burns and Lambert, 1852. (Reply to Reasons for Abjuring)
- Report of an Address delivered by the Rev. P. Connelly with a preface and dedicated to His Grace the Duke of Manchester, Chairman of the Rev. P. Connelly's Committee. London: James Ridgway, 1853 (D 8:145-182; see also D 8: 187-189) (Report of an Address, 1853)
- Note: The last two items, whose authors are unknown, were published in refutation of Pierce's case. The first item in the bibliography, the <u>Case of . . . P. Connelly</u>, was published in support of his case; its author is unknown (see D 8:131-134).

A. Pierce's Character and Career to the close of the CASE

Education

Pierce received a good education for his day, attending a classical grammar school. As he does not name it, we cannot know much of any bias or slant that might have underlain its philosophy. It might be useful, however, to comment on the anti-Catholic nature of the more widely used textbooks of the day.

In Foundations of Nativism in American Textbooks, 1783-1860¹ one finds a convincing study which would support the hypothesis that half-truths were presented in popular readers, geographies, and history books through false emphases, omission of fact, innuendo and undocumented conclusions. The author proposes that these books led "unthinking readers toward intolerance and racial and sectarian hatreds" which prepared Americans to believe some of the propaganda of the nativist movement of the eighteen-thirties and forties.

To a bachelor of arts degree from the University of Pennsylvania Pierce added the master's by fulfilling the requisite monetary payments. According to the records and to his letter to Father Roothaan, he had received his degrees at a very early age, which raises the question of intellectual precocity. It has been known for intellectually precocious children to be very slow in developing emotional and psychological maturity. Some have never succeeded in doing so.

Pierce also had a thorough theological training under the auspices of the Episcopal church. .

- 1 Sister Marie Leonore Fell (Washington, D.C.:
 Catholic University Press, 1941).
- ² Fell, p. vi.
- Jetter from Francis James Dallett, Archivist at the University of Pennsylvania, to Sister Mary Dennis Lynch, SHCJ, 8 October 1976. Original HCJ/R.
- 4 ARSI/Nov. Aur i, II, 14.
- Norman L. Munn, <u>Psychology: the Fundamentals of Human Adjustment</u> (Boston: Houghton Mifflin, 1966).

 See especially the chapter entitled "Intelligence," pp. 112-149; see also <u>The New Encyclopedia Britannica</u> (Chicago, 1975) "Macropaedia," 9, 676.

Some forces which may have influenced Pierce and his advisors

There would seem to have been at least four extraordinary and strong forces which may well have influenced Pierce in varying ways at different stages in his career; these could have influenced also, directly or indirectly, those who advised and supported him.

1. American Nativism, which may have been inbred in his education and which was developing at full force during his years as a student, as a minister in Natchez and as a professor at St. Charles in Grand Coteau, certainly must have had its effect. "Nativism" was deeprooted in Protestant America long before the term itself gained currency. It was born in the anti-Catholic prejudice which stemmed from the England of the penal laws. The sentiment was reinforced by the English wars against the Catholic nations of France and Spain.

Although it seemed to subside with the French alliance in 1778, nativism returned with renewed vigor during the first three decades of the nineteenth century as the victims of European unemployment and depression, many of whom were Catholics, 7 flooded the eastern cities of the newly established nation. Those who came were often paupers by the time they reached their new land, and some were petty criminals. This influx of a burdensome population bred resentment and reawakened dormant prejudices, reviving among the "natives" an antagonistic spirit which raised the "NO-Popery" cry. 8 This opposition was intensified by the fact that the growing number of Catholics ensured the growth of the Church and led to the building of parishes, churches, and the hierarchy with its resultant panoply which

frightened, for it showed the strength of the "dread enemy." 9

The crusade of the eighteen-twenties was fought by means of sensational newspaper articles, anti-Catholic speakers, and sensational stories about the immorality of priests and nuns. This phase of the movement sought to capture the imagination and support of the man in the street. That it did so successfully is evinced by the burning of the Ursuline convent in Charleston, Massachusetts, on August 11, 1834.10

Violent success, however, also brought reaction and the movement subsided for the moment while its chief supporters planned a new approach to capture religious people of the middle class without whom they could not hope for ultimate success. 11 Meanwhile the violence of the 1830-1840 period repulsed men and women who had the educational background of Pierce and Cornelia. They have both witnessed to this reaction (D 2:41; D 3:13-14) and their reaction has been acknowledged by others. 12

The words, the terms, the thought and the philosophy of this fanaticism must have rung in the minds and hearts of all, supporters and attacked alike, for many years. It has been known to have had its influence even in the twentieth century, e.g., during the election campaigns of Alfred E. Smith (1928) and of John F. Kennedy (1960). 13

Ray Allen Billington, The Protestant Crusade, 1800-1860: a Study of the Origins of American Nativism (New York: Macmillan, 1938). This is considered the authoritative work on the subject, based on primary sources and abounding with detailed notes.

Billington, pp. 1-31. See also J. C. Furnas, <u>The Americans</u>: a Social History of the United States, <u>1587-1914</u> (London: Longmans, 1970), pp. 523-527.

⁸ Billington, pp. 32-36.

⁹ Billington, pp. 37-38.

¹⁰ Billington, pp. 53-117.

¹¹ Billington, p. 142.

¹² Robert Gorman, <u>Catholic Apologetical Literature</u> in the United States: 1784-1858 (Washington, D.C.: Catholic University Press, 1939), p. 80.

¹³ Charles Hillman Fountain, "The Case for the Opposition to a Catholic President," Current History, 27 (March 1928), 767-778; see also "A Catholic in the White House?" Economist, 195 (16 April 1960), 247-248; and Dingle Foot, ". . . How Al Smith Lost his Way on the Sidewalks of New York," The Times (London), 30 October, 1976, p. 12.

2. Needs of the Church in America, particularly in the West, paralleled the growth of the Church numerically. While there were Catholics in the English colonies from very early days--Maryland, for example, was founded by Lord Calvert for Catholics -- they were comparatively few in number. Following the Congress of Vienna, which marked the end of the Napoleonic threat in Europe, postwar depression and the development of the industrial revolution led European governments to encourage emigration as a solution to the unemployment problem. While some, particularly Irish, went into Canada, most came directly to the United States. The Irish often used Canada as a port of easier entry into the United States. 14 Many of those arriving were Catholics, whose presence meant an unprecedented growth of the Catholic Church and a concomitant need for clergy, churches and schools. Of primary importance was the need for good competent priests who could speak English and, in those areas to which Germans flocked, German.

The bishops in both the east and the west felt constrained to try to recruit personnel from abroad as well as to open seminaries in which to prepare an indigenous priesthood. Money as well as personnel was not only needed but actively sought by agents sent by the bishops to Rome and throughout Europe. Welcome response to the appeals of the American hierarchy was made by European religious orders, e.g., Order of Preachers, Vincentians, and the Society of Jesus. 15 Financial aid and personnel support came from missionary societies like the Propagation of the Faith and the Leopoldine Association of Vienna. 16 The latter was founded in Austria with the blessing of Metternich and the emperor for the specific purpose of aiding the American missions.

3. Pressures from those who received the Connellys in Europe and who presumably supported, directly or indirectly, missionary endeavors in the United States must also be considered. It is not possible to identify specifically which members of the aristocracy who fêted the Connellys during their first visit to Rome in 1836-37 were supporters of European activities in the American missions. Certainly, royalty and noble personages of the highest order in Austria and Bavaria were more than slightly interested and supportive. The Rt. Rev. Edward Fenwick wrote from Cincinnati on 15 January 1830 a letter to the Emperor of Austria "in which he thanked the Emperor for bestowing his protection on the newly founded Association" (Leopoldine). 18 Bishop England, who sent reports regularly to the Leopoldine Association in Vienna, has stated:

I also had audience of the Emperor to thank him for the relaxation of the law /which forbade any benefaction or aid to any person or institution outside the German states/ and to inform him of the benefits thereby done to our churches. 19

Upon the establishment of the Leopoldine Association, Bishop Fenwick (Cincinnati), his emissary Father Rese having been the moving force in its foundation, 20 wrote a letter of gratitude to the Emperor Francis I to which Prince Metternich responded in the name of the emperor. 21

Pierce in a long journal-type letter to his brother John told of being received by Metternich and said that his letter of introduction was from the Cardinal Secretary of State (Lambruschini) (D 3: 175-176). This letter of Lambruschini's raises the question, "Why?" Pierce evidently thought it important enough to report his felicitous visit to Cardinal Fransoni, for in writing to Pierce about three months later Fransoni noted that Lambruschini had

¹⁴ Billington, pp. 33-35.

Robert Frederick Trisco, The Holy See and the Nascent Church in the Middle Western United States,

1826-1850 (Rome: Gregorian University Press, 1962),
pp. 183-204.

¹⁶ Trisco, pp. 240-281.

Theodore Roemer, The Leopoldine Foundation and the Church in the United States, 1829-1839 (New York: U. S. Catholic Historical Society, 1933).

¹⁸ Raymond Payne, "Annals of the Leopoldine Association," <u>Catholic Historical Review</u>, I (1915-16), 52.

¹⁹ Bishop England's Works, Messmer edition (Milwaukee: Arthur H. Clark, 1908), VII, 124.

²⁰ Roemer, p. 154.

²¹ Roemer, pp. 152-154.

been pleased at the graciousness with which Metternich had received Pierce. The cardinal also referred to the part played by the Austrian ambassador (D 3: 183).

Several of the prominent families who received the Connellys in Rome were leaders of the English Catholic revival, 22 and it is reasonable to presume that their interests and ardor made them fervent for the conversion of the Americans and for the successful establishment of the Church in the United States.

4. Political pressures were brought to bear upon the Church as a result of this European activity in its development. Nativistic writers such as Samuel F. B. Morse²³ and Lyman Beecher²⁴ saw the papacy as a threat and the Holy Alliance as an unholy alliance determined to undermine American republicanism and freedom; they saw American political institutions as obnoxious to upholders of European forms of government, i.e., European despotism. American nativists saw a real plot for conquest through the directed migration of minions who would prove to be "uneducated voters in the hands of demagogues;" who under the influence and "at the bidding of the powers of Europe hostile to free institutions, and associated in holy alliance" 25 would extinguish the light of freedom and liberty. They saw Metternich, in an alliance between Rome and Vienna, as the arch enemy. Beecher further expatiated on the potential power of the Catholic clergy, "dependent on a foreign jurisdiction" and "foreign patronage," to wield in mass the voting strength of their people, leading candidates and administrations to favor Catholics since their positions in office and power might "be thought to depend on Catholic suffrage,"27 Although adamant

- Dennis J. Clark, Proud Past: Catholic Laypeople of Philadelphia (Philadelphia, 1976), p. 19.
- Foreign Conspiracy against the Liberties of the United States by Brutus /pseud/ (New York, 1835). This is by the "inventor of the telegraph, who gained his first fame as an artist and anti-Catholic propagandist" (Billington, p. 122).
- 24 Lyman Beecher, D.D., Plea for the West (Cincinnati, 1835).
- 25 Beecher, p. 50.
- 26 Beecher, pp. 55-56; see also Roemer, p. 6.
- 27 Beecher, pp. 56-57.

regarding the value and essential need for literacy and education in a republic, he questions:

Can Jesuits and nuns educated in Europe, and restrained by the patronage of Catholic powers in arduous conflict for the destruction of liberty be safely trusted to form the mind and opinions of the young hopes of this great nation? -- Is it not treason to commit the formation of republican children to such influences? ²⁸

Beecher saw education, supported by Europeans, as another weapon in the fight to put down republican freedom. Morse thought along the same lines but emphasized politics and the need to keep the political character of popery in mind at all times and to oppose it at all costs. He was convinced that the Leopoldine Association was an instrument created to destroy American freedom and liberty. He suggested that Catholics be required publicly and formally and officially to renounce foreign allegiance and anti-republican customs."29 Both of these writers, like others, tried to be true to the official policy of eschewing intemperate frontal attacks for the moment, but found it almost beyond their powers of restraint. Morse looked with sympathy on the condition of poor immigrants arriving in great numbers from Germany and Ireland, but attributed their poor state to the "grinding oppressions of Papal government" and wrote at length on the ills of popery which pursued them "into the very sanctuary of freedom to grasp again their scarcely escaped prey."30

These protagonists saw their beliefs confirmed by Metternich's attempt to return Latin American republics to their former imperialistic owner, Spain, an attempt which was forestalled only by the pronouncement of the Monroe Doctrine by the United States government, supported at least implicitly by Great Britain. 31

- ²⁸ Beecher, p. 105
- ²⁹ Morse, p. xii; see also Roemer, pp. 146-149.
- 30 Morse, pp. 177-180.
- 31 <u>Cambridge Modern History</u> (Cambridge, 1934), 3, 369-370.

That the struggling bishops would turn toward these same powers for personnel and material aid was proof to some that the pope was in alliance with Metternich. This portrait of European politics and Church alliance lent credence to even the most rabid contentions of those who hated Catholicism and feared the influx of immigrants to the United States. They were convinced that Catholics were unreliable citizens and that in the event of a struggle between liberty and despotism, they would support the latter.

Meanwhile the Church was attempting to develop schools, seminaries, parishes and the other structures she needed. Missionary work, with hoped-for converts, was very important in this evolution. The conversion of a well-known Episcopalian minister was without doubt a welcome achievement in the midst of the many cross currents of religion and politics in which she found herself.

The point here is not whether the political allegations were true or not but rather that they were believed as true by some people, a circumstance which brought great pressures on the Church in the United States and perhaps on Pierce himself.

Personal history

A curious picture of Pierce's life can be seen in terms of his need for greatness, his reaction to failure and an inability to cope with criticism.

It is tempting to draw conclusions regarding Pierce's psychological state and mental stability, but such conclusions must be left to the experts. 34 Nor may a judgment of his motives be made. Let the facts, however, be reviewed; let them speak for themselves.

- 1. His family relationships seem not to have been felicitous as witnessed by his mother's complaints regarding Pierce's attitude toward his brothers who had not enjoyed all the advantages he had (D 2:46-47). His own letter of 15 April 1836 reveals his
- 32 Billington, pp. 123-124; Morse, pp. 43-46.
- 33 Billington, p. 123; Morse, pp. 15-17.
- 34 Georges Cruchon, S.J., "The Case of Pierce Connelly," Source #5 (Autumn 1976), pp. 5-19 (abridged English version by Mary Etheldreda Wilcox and Ursula Blake, SHCJ).

repentance for his behavior as a son toward both mother and father. Despite his strong efforts to effect the conversion of his mother and other members of his family, he was generally unsuccessful (D 3:93-96; D 5:70). On the other hand several of Cornelia's family came into the Church (D 4:41-42, 76).

- 2. He aspired to the rectorship of Holy Trinity in Boston; he settled for Holy Trinity in Natchez (D 9: 176).
- 3. When seemingly on the top of the Episcopalian world of his day, he resigned. Why? Not enough light and splendor? limelight? There was to be a division of the Episcopalian diocese of Tennessee. Did Pierce fear, albeit subconsciously, that he would not be chosen as its bishop? Cornelia says: "To find out the truth--the blessed truth . . ." (D 2:57). But he did it with such a splash; published letter of resignation (D 3:2-17) and public farewell sermon (D 3:24-28) made a spectacle which his relatives criticized and regretted (D 2:70-71). 35
- 4. As a result of the panic of 1837³⁶ the Connellys were forced to return to Natchez from the European courts where they had been so well received. Pierce had no profession; even after his appointment to the St. Charles College faculty he was not at first the breadwinner nor ever again the sole breadwinner for the family. Cornelia gave lessons to help put food on the table (D 4:19-20; 57-58; D 72:25-26). ³⁷ Nor did they have a home of their own in Grand Coteau for at least nine months (D 4:20-22, 25; D 64:7).
- 5. He proved to be a poor teacher, disliked by his students and many of his peers; ³⁸ he was criticized for "his still Protestant views." ³⁹
- Reasons for Abjuring, p. 6: "But though my allegiance to the Church of Rome was a delusion, and a culpable delusion--for it had its origin in carnal-mindedness and pride,--it was most sincere."
- 36 Cambridge Modern History, 7, 385.
- 37 Letter of Mrs. Odeide Mouton to Madame M. C. Wilson, RSCJ, Lafayette, Louisiana, April 1909 original HCJ/R.
- 38 ARSI/N. Aur. 1, II, 30ff.
- 39 ARSI/N. Aur. 1, IV-10; ARSI/N. Aur. 1, III-8.

- 6. Pierce in his letters attacked in a mild way the people he had come to serve (D 4:20-22) and those with whom he worked. 40
- 7. He went off to Rome to begin the negotiations which would end with his ordination and his brief career as a Catholic priest:
- a. Rejecting Bishop Blanc's advice and veiled warnings, he took Mercer to England as the first step in attaining his goal (D 4:143-144).
- b. While there is no extant evidence to support Lord Shrewsbury's response as reported in Gompertz (chapter VI), even Pierce recorded that Shrewsbury advised "the thing unpracticable for the present" (D 4:180). Yet he ignored the advice.
- c. When seeking further counsel, he reported Shrewsbury's advice to Father Lythgoe, the Jesuit provincial, saying that he (Pierce) "shall consider . . . you as speaking the counsels of God to me and by his grace be ready to follow them" (D 4:180). Yet he does not return to the United States for a couple of years and establish financial security for Frank's future, which was the advice in Father Lythgoe's reply (D 4:181-182).
- d. His petition was accepted by Pope Gregory XVI and the proceedings toward ordination were speedily implemented (D 7:91). Certain family meetings and other arrangements for the good of the children were approved. Even Cornelia, however, must have seen some evidence to make her doubtful of his eventual fidelity, for prior to taking her vow of chastity she expressed willingness to resume "their previous mode of life," an offer which was not accepted (D 7:91).
- e. The decision was made by Pierce or others that he should not be a Jesuit (D 72:109).41
- 40 ARSI/N. Aur. i, II, 14.
- 41 Although Pierce had intimated that the decision was his own, in 1851, when he wanted to use the evidence in his petition to the House of Commons, he wrote that he had been remonstrated with by "the general of the Jesuits in person" for the disedifying conduct "of being in company with his wife 'every day and all day' " (D 6:161).

- f. He "lost his visiting rights" and hardened his heart against Dr. Asperti, the Jesuits, and Cardinal Wiseman. Then he removed the children from England in an effort to force Cornelia to his will (D 6:161ff).
- g. While serving as a chaplain at Alton Towers, Pierce became entangled in Irish politics which not only left him in the bad graces of Irish priests and bishops 42 but also ended whatever hopes he may have had for a red hat (D 6:60-66; 69-70, III).
- h. By asserting what he believed to be his rightful position toward the <u>Rule</u> of the Society of the Holy Child Jesus he forced Cornelia to disabuse him of the idea that he was the founder of the Society, to declare to him and to lawful authorities that any rule which he might present should be considered spurious (D 5:203-209, 210-211; 214-215, 216).
- i. Pierce then instituted the CASE as has been reported in the various biographies of Cornelia (and D 7). He failed there, too, and undertook a trial via the press, which will be studied in the second part of this article (in the next issue of Source).

The above collation is not meant to suggest insincerity on Pierce's part but rather to ask a question. Is there an emergence of a pattern in all these movements which shows that at least subconsciously Pierce seeks a way out rather than a way to meet a situation in a mature manner. Only the expert psychologist or psychiatrist is qualified to give a scientific and fair answer, and even he may hesitate. 45 The lay student of this story may see, however, the vague outlines of a pattern of geographic flight, conversion (symbolic flight?), mild attack, flight, change of vocation, attack, apostasy, and violent attack as Pierce attempted to cope with disappointments, ambition, jealousy, criticism and failure. The greatest failure in his eyes may well have been his attempt to regain control of Cornelia and the community she had founded, and this brought about the most violent reaction.

- 42 Bishop W. O'Higgins to Dr. Cullen, Dublin, 28 Feb. 1848, original, Collegium Hibernorum de Urbe, Cullen, No. 1551; Fr. John Miley to Dr. Cullen, 27 Feb. 1848, Original <u>ibid</u>., No. 1550.
- 43 Cruchon, p. 18.