

Favoured or oppressed? Married women, property and ‘coverture’ in England, 1660–1800

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ABSTRACT. *In the eighteenth century, the condition of English wives under ‘coverture’ was both defended as one of privilege and attacked as worse than slavery. This article suggests that married women were not in reality confined within coverture’s regulations on credit and property ownership. Their economic activities were fairly broad and flexible and they had an instinctive sense of possession over some goods during wedlock, perceiving their contributions to marriage as a pooling of resources for familial benefit. It will be suggested that wives did not necessarily think that their conduct in acting as if some marital property was legally theirs was illegitimate, because it was facilitated by coverture and the legal devices that allowed it to function.*

MARRIED WOMEN’S STATUS IN COMMON LAW

Treatises in the eighteenth century dealing with the position of wives and husbands under the common law introduced their lengthy texts by acknowledging its restrictions on women, yet all went on to state matter-of-factly either that ‘a Feme Covert is a Favourite of the Law’ or that England was ‘the Paradise of women’.¹ The legal and economic limitations imposed on married women stemmed from the legal fiction that a husband and wife were one person.² As the anonymous *The laws respecting women* of 1777 explained, by ‘marriage the very being or legal existence of a woman is suspended; or at least it is incorporated and consolidated into that of the husband; under whose wing, protection and *cover*, she performs everything; and she is therefore called in our law a *feme-covert*’.³ Lacking

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any separate legal existence under 'coverture', a wife could not technically enter into economic contracts in her own right and in order to make basic purchases on credit had to do so in her husband's name. A husband gained outright permanent possession of all his wife's moveable goods and had the right to manage his wife's land and to receive its rents and profits during marriage, though he required his wife's sanction to dispose of it.⁴

The so-called favouritisms that wives enjoyed also stemmed from their lack of legal identity. The privileges and rights described by the legal guides can be grouped into three general categories.⁵ Firstly, coverture imposed obligations upon husbands. A wife was entitled to be maintained and to make purchases of necessaries as her husband's agent.⁶ Secondly, wives were afforded some protection against the unbridled power of their husbands. They could obtain 'surety for the peace' – a bond which obliged a husband to keep the peace towards his wife – against violent husbands, could retain property in marriage through 'separate estate' – a means by which property could be protected for the sole use of the wife during matrimony – and could protect certain rights through equity courts.⁷ Finally, married women enjoyed the evasion or mitigation of punishment in certain types of offences. For example, a wife could not be punished for committing theft in the company of her husband, because the law supposed that she acted under his coercion. Wives' inability to make financial transactions in their own name also prevented them from being sued and therefore imprisoned for debt.⁸

Such complacency about wives' legal privileges was not universal. The anonymous female author of *The hardships of the English laws in relation to wives*, published in 1735, attacked coverture. Her main complaints were that the laws put wives 'in a worse Condition than *Slavery*', subjected them to their husbands' unlimited power and allowed them 'no Property'.⁹ In her opinion, 'favouritisms' of the law were a means to an end, created to serve men's needs. Moreover, their substance demeaned women's moral character.¹⁰ *The hardships* also compared English laws unfavourably with Roman civil law, as the latter awarded married women better inheritance rights, greater control over personal property and the ability to safeguard their marriage portions from their husbands.¹¹ This admiration for the system of law prevailing in other European countries may have been misplaced, since it has been suggested that 'in practice, there were probably many similarities in property distribution between England and Europe'.¹²

The appeal in *The hardships* that the laws be amended failed to persuade those who were convinced that English wives enjoyed numerous legal privileges. One (male) critic dismissed its author's complaints in 'Remarks' on *The hardships* published in 1736 in *The Weekly Miscellany*.¹³ He accused her of transforming married women's legal exemptions from

'several Pains and Penalties' into insults, grievances and affronts. Rather than engage with *The hardships*' arguments, he ridiculed them and employed familiar stereotypes about women. For example, wives who were forced or persuaded to give up any of their separate estate to their husbands confirmed 'the Weakness of the Sex, and how improper it is they should be trusted with the Interests of others, who cannot maintain their own'. He explained that English wives did not merit more egalitarian property rights, as in Roman civil law, because their inconstancy and extravagance required that they be protected from themselves.¹⁴

THE HISTORIOGRAPHY OF MARRIED WOMEN'S EXPERIENCE
OF COVERTURE

Historians have argued that the legal rights of women were greater in some periods than others, but few today would claim that women were the favourites of English law.¹⁵ It is becoming apparent, however, that in practice coverture was often ignored or bypassed. In the first place, women were not quite 'Dead in Law', the author of *The hardships*' powerful phrase demonstrating common law's effect on married women.¹⁶ Three other jurisdictions – equity, ecclesiastical law and customary law – gave women individual rights, redress and opportunities for litigation.¹⁷ Thus studies of ecclesiastical courts, central equity courts, quarter sessions and local courts of requests all show that wives appeared as sole and co-plaintiffs and defendants in very large numbers.¹⁸ Secondly, practice and theory diverged considerably, as research into women and their relationship with property demonstrates. Amy Erickson concludes that 'in practice wives maintained during marriage substantial property interests of their own'.¹⁹ Christine Churches in her analysis of the transfer of women's real property held by customary tenure between 1660 and 1750 in Whitehaven finds that women handled their assets with expertise, indicating that 'even before inheriting they had not been excluded from the world of business by their fathers and husbands'.²⁰

Thirdly, a new focus on women's role in eighteenth-century consumption has uncovered that their purchasing activities helped stimulate economic growth and industrialization and influenced urban development.²¹ Many of these female consumers were married women. Yet in an economy in which most buying and selling involved credit, married women's ability to make purchases on credit in their own name was denied by coverture.²² Margot Finn is one of the few historians to explore in detail the common law's device of the law of agency (she refers it as the law of necessities), which permitted a wife to be economically active by pledging her husband's credit for necessities (food, clothing, lodgings and

medicine).²³ A fourth line of relevant enquiry traces women's attitudes to their possessions, usually moveable goods. Lorna Weatherill's work on late seventeenth- and eighteenth-century probate inventories concludes that women and men shared similar motivations for owning many moveable goods.²⁴ In contrast Maxine Berg analyses eighteenth-century bequests and Amanda Vickery examines Georgian correspondence and diaries to argue that women derived distinctive emotional and familial meanings from their possessions.²⁵ Finally, insights into labouring women's ideas about property arise from research into women's involvement in offences against property. By analysing the types of goods stolen by women in the late sixteenth and seventeenth centuries, Garthine Walker finds that 'they had a developed and distinct investment in certain types of moveable property which was different from men's and which bears little correlation to legal categories of ownership'.²⁶

AIMS AND SOURCES

In this article I will consider some of the questions about married women's experience of credit and property that have been raised by these studies. I will show that married women's use of the law of agency to make purchases for the household was commonplace. Case-studies of two eighteenth-century gentlewomen, Judith Baker and Elizabeth Shackleton, do not differentiate between their purchasing activities as wives and as widows.²⁷ In this article I will therefore consider whether the act of consumption differed for women before, during and after marriage and whether married women restricted their purchasing to basic necessities in line with the law of agency, when luxuries were increasingly available. The law of agency allowed a woman to act as her husband's economic agent in the domestic and business spheres and in gendered marital economic roles, dividing husbands and wives into male provisioners and female consumers. The marital relationship complicated matters, however, so that wives did not always see their role as dependent and supplementary. Judging by the wills of spinsters and widows, women had intense feelings about their possessions. A married woman in this period could make a will with her husband's consent, yet it was rare for women to do so.²⁸ Thus, did married women suspend their feeling of possession over certain goods during marriage, when husbands gained ownership of all their wives' personal property? This article offers some supporting evidence to Erickson's suggestion that this was unlikely.²⁹ Though separate estate (by which property could be protected for the wife's sole use, as we have seen), might account for some instances of continuity in feelings of ownership, it by no means explains all.³⁰ Erickson argues that many

spouses of quite modest means entered informal agreements.³¹ It is therefore open to question just where ad hoc agreements shaded into a popular opinion that some property belonged to wives throughout marriage.

This article is based on over 1500 instances of marital conflict collected from three main sources: litigation concerning marriage that came before Durham, York and Oxford ecclesiastical courts; cases of wife-beating, desertion and separation dealt with by the courts of quarter sessions in Northumberland, Newcastle, Durham, North Yorkshire, Buckinghamshire and Oxfordshire; and advertisements placed by husbands in Newcastle, York and Oxford newspapers, in which they refused to pay their wives' debts. These records of marital difficulties provide a fairly broad geographical, social, economic, and occupational coverage, including people from the ranks of wage-labourers, those of the middling sort and occasionally the gentry. The public announcements also help to balance any gender bias in the sources since most were made by husbands, in contrast to the other types of marital difficulties, many of which were initiated by wives. The methodology I have used lessens the risk of providing only examples of the exceptional rather than the norm. Spouses' 'secondary' complaints (365 in total) were analysed in addition to their 'primary' complaints of cruelty, adultery and desertion, which ostensibly brought the marital conflict to public view. These secondary complaints were expressed in all the sources by both sexes from all the social and occupational categories studied. Therefore they help build up a picture of people's expectations of acceptable and unacceptable marital behaviour, expectations which were shared across England. Most importantly for the purposes of this article is that approximately three-quarters of these complaints concerned the material aspects of married life, often focusing on provision, on household expenditure and management and on spouses' ownership of property.³² These complaints offer further insights into married women's daily experience of coverture.

THE LAW OF AGENCY IN EVERYDAY LIFE

A married woman could not contract debts in her own name. Instead, the common-law device of the law of agency provided her with the right to purchase necessities in her husband's name, according to his rank and wealth. A husband's consent to his wife's pledging his credit was assumed from the couple's cohabitation. As *The laws respecting women* stated in 1772, 'the husband shall answer all contracts of hers for necessities, for his assent shall be presumed to all necessary contracts, upon the account of cohabiting'.³³ This implied authority meant that retailers and traders could deal confidently with a wife without checking whether she had her

husband's permission to act as his agent.³⁴ A wife therefore had the right to make purchases using her husband's credit while they cohabited, even if she was known to be adulterous. The right still applied if her husband turned her out or if she was forced to leave her husband to escape his violence. Wives were not entitled to use it, however, if they ran away from their husbands for any reason, or if the couple entered into a mutually agreed separation and the husband paid a fixed maintenance.³⁵

Since in most cases a married woman was automatically given the right to pledge her husband's credit, a husband had to take public steps to deny her the use of his credit and explain why he did so. This was done by giving personal or general notice to traders and retailers. The passing references to the use of bell-men (town criers) and the consistent placing of press advertisements shows that many husbands chose to give general notice. However, the legal handbooks differed over which form of notice was best. Both *A treatise of feme covert*s and *The laws respecting women*, for example, recommended that husbands give personal notice to individual traders, as general notice given by newspaper advertisement was not sufficient prohibition.³⁶ Richard Burn, on the other hand, stated in 1763 that general notice was adequate notice in cases of the wife's elopement or of mutual separation.³⁷ Thirteen newspaper titles, examined every fifth year, yielded 278 such announcements.³⁸ These advertisements provide welcome insights into married women's use of the law of agency during cohabitation, whereas Finn has demonstrated its use during separation. Separated women pledged their husbands' credit in the absence of a more secure regular maintenance payment and wealthy women may have deliberately amassed large debts in order to force their husbands to agree on a generous maintenance.³⁹

Advertisements were structured around husbands' legal obligations and fell into three main categories, the majority of which did indeed refer to separation. Firstly 56 per cent (157) of the husbands denied their credit to wives who had eloped. In 1749 Thomas Spetch announced in *The York Courant*, 'Whereas Anne Spetch, the Wife of Thomas Spetch, of Ouse-Bridge, York, has left her said Husband this is to caution all Persons not to trust her hereafter, for that he will not pay any Debts on her Account'.⁴⁰ Secondly, 12 per cent (34) explained that the couples were separated by mutual consent with an arranged alimony. In August 1771 Ephraim and Dorothy Anderson of Sunderland placed an advert informing the public that they 'are now parted by Agreement, and he allows her a separate Maintenance'; therefore he would not pay her debts.⁴¹ Thirdly, another 24 per cent (68) of the husbands refused to pay their wives' debts without mentioning elopement or separation and it seems that the couple continued cohabiting. Thus in 1749 Robert Thompson, a farmer, simply warned 'that

he will not pay or discharge any Debt she [his wife] shall contract from the Day of the Date herof'.⁴² The legal status of this announcement is questionable and more typically a man would explain that his refusal was due to his wife's extravagance, which endangered their economic well-being. Robert Wright of Sunderland advertised that no one was to give credit to his wife after 29 September 1768 because she had 'contracted several debts, unknown to me, to my great injury'.⁴³ The particular strength of the advertisements in this context, therefore, is that they confirm what the legal handbooks imply: that the law of agency was routinely and consistently used during matrimony.⁴⁴

The announcements also add another dimension to our knowledge of the economic relationship between spouses. Rather than illustrating the economic dependency of wives, they reveal the significance of a woman's economic activities for her husband's reputation. After all, unsettled debts would damage a man's economic status among local traders and could potentially land him in gaol. Such adverts were a defensive action to protect or restore the man's own credit. This is evident in the way that announcements were regularly titled 'Caution', used words like 'warning' and advised that the wife should not be trusted. In 1781 Robert Howes, a yeoman from Gloucestershire, advertised that he had 'been much prejudiced in my Circumstances by my Wife contracting Debts unknown to me'.⁴⁵ If the adverts suggest that some husbands expected to be kept informed about their wives' purchases, they also indicate that wives nonetheless exercised a degree of economic autonomy. It is not implausible, therefore, to infer that married women had their own credit status, reputation and networks. Household management gave married women a sense of self-identity and public worth, but some also derived credit from their roles in exchange and trade.⁴⁶ Even women who brought cases of sexual defamation were sometimes attempting to protect their business reputation as much as defending their sexual honour.⁴⁷ Hunt suggests that some London wives organized 'secret or semi-secret financial networks and sources of supply' because they objected to being financially dependent upon their husbands.⁴⁸ Evidence is limited, but it suggests that these networks were not necessarily secret from men, though this could obviously be useful. An American midwife's diary, written between 1785 and 1812, shows that housewives traded goods and labour, employed their own and neighbours' daughters and 'reckoned accounts independently of their husbands'. Indeed, a 'broad and largely invisible local economy managed by women' existed, but it has been invisible to historians rather than to the women's husbands.⁴⁹ Few women kept enduring records of their separate accounts or business activities; for example, in the early eighteenth century, Margaret Sayer, a married ale seller, recorded who

owed her money in chalk on a board.⁵⁰ It was usually husbands' names that were entered in formal record keeping, thereby removing evidence of their wives' commercial activities.⁵¹

It is relevant, therefore, to trace the extent of English married women's perceptions of the law of agency and the abilities it conferred. Firstly, it is interesting to consider how far wives experienced any disjunction in their financial transactions over their life-course. After all, single and widowed women made purchases on credit in their own names, and then at marriage were obliged to use their husbands' name. It is likely, however, that there were elements of continuity too. Many women would have continued to use the same shops and retailers on setting up their new household at marriage. It is possible to hypothesize that some might have made purchases with the same traders during widowhood, in their married name, until they remarried and adopted another man's surname. This would make it imperative that local traders were as confident about trading with women as individuals as they were about the men they married. A further factor that would complicate women's perceptions of their economic activities was local and borough custom, which allowed a married woman to trade as *sole feme*, thereby permitting her to make purchases in her own name.⁵² It is becoming apparent that wives ran many service businesses independently, though it is not always clear whether this was due to local custom.⁵³ Margot Finn's work on local courts which mediated small-debt reclamation, like the courts of requests in the later eighteenth century, even shows that wives were frequently treated by creditors as though they could contract necessary debts in their own names.⁵⁴

A further question is whether married women operated strictly within the limits of the law of agency, paying only for clothing, food, lodgings and medicine for domestic use. The range of goods available to purchase for domestic and personal use was increasing throughout the long eighteenth century.⁵⁵ Moralists defined many of these items as luxuries and associated their consumption with women, who were criticized for their profligacy in purchasing unnecessary items, usually clothing and decoration.⁵⁶ Thus instructional commentaries about the perils of excessive consumption often featured extravagant wives.⁵⁷ Amanda Vickery has usefully critiqued this contemporary vein of thought and reminded us not to accept it at face value.⁵⁸ Yet there is evidence suggesting that married women were not simply buying mundane household items. Litigation by creditors who sued men for their separated wives' debts often turned on whether the wife had bought unnecessary items. This was because the law of agency defined necessities according to the man's status, occupation and wealth.⁵⁹ One case was decided in favour of a clergyman who was sued to recover debts that his estranged wife had contracted. Though the judge pronounced that

'every man is bound to provide for his wife in the necessaries of raiment according to his circumstances', he categorized the millinery goods that she had purchased as mere trappings.⁶⁰ Furthermore, 10 per cent of the secondary complaints in the records of marital difficulties were made by husbands accusing their wives of extravagance and financial mismanagement. In response to his wife's suit for restitution of conjugal rights in 1708, Thomas Wood, a sea-faring man of Whitburn, explained that he had separated from her because she had lived extravagantly, contracting debts during his time at sea that reduced him to poverty.⁶¹

The complaint of financial mismanagement sometimes referred to business as well as household concerns, when men claimed that their business had been damaged by their wives' actions. In 1723 one farmer declared that his stock was not worth £100, as his wife estimated, but no more than £40 because of her mismanagement.⁶² Similarly social criticism and advice to tradesmen commonly blamed wives for their husbands' bankruptcy. Daniel Defoe, in *The complete English tradesman* noted, 'I know 'tis a common cry that is rais'd against the woman, when her husband miscarries, namely, that 'tis the wife has ruin'd him', though he went on to observe that this was not generally true.⁶³ This was not just a literary device. A number of husbands accused their wives of bankrupting them. In 1730 Henry Hendry, a wherryman, responded to his wife's accusation of physical abuse with a petition that her ill-management and contracting of debts had impoverished him so that he was carried to Newcastle gaol.⁶⁴ Unfortunately it is difficult to be certain whether the husbands were accusing their wives of commercial or personal fiscal mismanagement. Household and business accounts were not always kept separately in this period and there was no distinction between personal and business liability.⁶⁵ What can be said is that this overlap allowed wives to participate in both domestic and business concerns and make purchases for both. For example, wives ran inns and shops in effective partnership with husbands and probably bought supplies to service inn and public-house customers or ordered stock.⁶⁶ Alexandra Shepard's examination of debt litigation in the Cambridge University courts between 1580 and 1640 uncovered wives who were engaged in extensive buying and selling of clothes and household wares, which were not just for their own household consumption. One wife supplied a fellow of St John's College with food and clothing.⁶⁷

It could be argued that such wives were simply acting at their husbands' direction, within the legitimate bounds of coverture. Agency was a broad concept in common law, under which one man gave another individual the authority to act on his behalf without gaining any rights or benefits.⁶⁸ Many people acted as agents. Men executed commercial transactions on

behalf of other people as servants, apprentices, employees, junior partners or brokers. Female servants made purchases on account for their households. Women also acted as the principal as well as the agent in business concerns, probably as widows in the following examples. In 1785 Ann Salmon, of Scarborough, advertised warning merchants and traders not to give credit to her son-in-law John Taylor, a master mariner and shipwright, because she would no longer pay for any goods contracted in her name.⁶⁹ In 1769, Margaret Alan, an Oxford brewer, refused to pay her son's debts after their partnership was dissolved. Two weeks later the son advertised that he would not be answerable for any debts that Margaret might contract.⁷⁰ Women were also authorized to act as their husbands' business agents. Higher-status men sometimes formalized this by awarding power of attorney to their wives. John Ridgway, attorney at law, advertised in 1757: 'I did some time ago execute a letter of Attorney unto my wife Ann Ridgway, late of Star Inn, Oxon, to sell and dispose of (for my use) my goods and effects and also receive such debts as were then due – but have now revoked the letter', largely because he believed she was using the money and effects for her own benefit.⁷¹

Since wives were merely acting as agents on their husbands' behalf under the law of agency, did it enforce feelings of dependency when they used it? Catherine Ettrick had power of attorney for four years while her husband was a purser in the Royal Navy in the East Indies. Her management of his estate and numerous business affairs was raised in their separation suit on the grounds of cruelty that she brought against him in 1765. She had clearly derived great satisfaction from her 'Diligence and Industry' and expected him to be grateful. She claimed that instead of 'showing her any Marks of his Esteem for her great frugality and care during his Absence he had not been at home one month she believes before he cursed and Damned this Respondent and said he insisted Wives should and ought to be nothing but Vassalls and Slaves to their Husbands'. Catherine assumed his reaction would be condemned.⁷²

Indeed, there are reasons not to simplistically equate the role of economic 'agent' with emotional or even economic dependency within marriage. Firstly, wives contributed earnings and labour, which were often essential to a family's economic well-being, and assisted with the settling of debts.⁷³ Although under coverture 'the Husband is entitled to the Fruits of his Wife's Labour',⁷⁴ it is difficult to see how women could escape feeling that they were the source of earnings that paid debts that they themselves accumulated. Even those who supplied unpaid labour must have been aware that it assisted in settling debts. Secondly, some wives provided knowledge that facilitated business endeavours. There are numerous examples of wives keeping business accounts in Western Europe

and America.⁷⁵ Moreover they paid their husbands' business debts and received payments. When one Sunderland master mariner was at sea, his wife managed his quarterly payments on a sum he had borrowed to finance a ship. She paid the sums to the wife of the agent who had organized the debt.⁷⁶ Thirdly, as we shall see, there is evidence that wives felt that they made purchases on behalf of their households and families, rather than as their husbands' agents.

WIVES' MATERIAL CONTRIBUTIONS TO THE HOUSEHOLD

The doctrine of coverture implies that economic roles in marriage and the household were gendered.⁷⁷ The law assumed that husbands supplied cash or credit and that wives used it to purchase goods. This conceptualization of male provision and female consumption was also found in descriptions of the household economy in advice literature.⁷⁸ Married women understood and claimed their right to be maintained. One of the most frequent secondary complaints (21 per cent, 78 out of 365) was made by wives who claimed that their husbands failed to 'provide for' or 'maintain' them, using the terms interchangeably.⁷⁹ The complaints took two forms. Firstly wives alleged that during cohabitation their husbands removed necessaries from them or refused to supply cash or credit to purchase them. They categorized this as cruelty. In 1744 Mary Giles advertised that her husband had denied her and her children 'the common Necessaries of Life, and even carried his Cruelty so far as to insert the said Advertisement [denying her credit], in order to prevent their obtaining Relief'.⁸⁰ Secondly, women accused their husbands of failing to provide for them and their families by deserting them or turning them out.⁸¹

There is also evidence that wives interpreted their right to male provision as compensation for the loss of their property rights and economic disabilities within marriage.⁸² Historians have shown that a woman's portion (her first material contribution to wedlock) was conceptualized as entitling her to a jointure, an annuity paid to a widow for life or during her widowhood.⁸³ This was facilitated by frequently used legal procedures which linked portions with jointures, as can be seen in the sample deeds, conveyances, bonds and settlements that conclude *A treatise of feme covert's*.⁸⁴ The widow Mary Giles contributed £50 at marriage in 1741 and received a jointure of £4 10s annually in return.⁸⁵ This was approximately one-tenth of her portion, so she would need to survive her husband for more than ten years to get all her portion (not to mention accrued interest) back.⁸⁶ Wives also felt that their portion entitled them to maintenance during marriage, in contrast to Margaret Hunt's suggestion that they offered sex and obedience in return for provision.⁸⁷ Thus wives' complaints to the

ecclesiastical courts frequently highlighted how much they had brought to the marriage, before explaining that, despite this, their husbands refused to contribute. This standard formulation also appeared in petitions to the quarter sessions, when wives sought poor relief. Anne Foster began her petition for relief in 1673 by explaining that she had brought £100 to her marriage, yet her husband had left her and their two children without maintenance.⁸⁸

But there is evidence that in this, too, married women's experience of coverture was more complex than the doctrine implied. Marital activities in the domestic economy were not as gendered in everyday application. This is evident in documentary material generated by the poor laws, where, for example, we see that some parish authorities brought women before the quarter sessions for leaving their husbands and children and thus causing their family to be a charge on the parish. In 1773 Oxford's guardians of the poor advertised in *Jackson's Oxford Journal* for information about the whereabouts of Hannah Morse who had deserted her husband, a writing master, and their children. The advert pointed out that her husband was ill and therefore he and their children must now become a burden on the rates.⁸⁹ Examples such as this suggest that wives were officially viewed as replacement providers in their husbands' absence or illness.⁹⁰

It must be stressed that married women did not see their roles as secondary; they saw the maintenance of a family as a dual activity. The term 'provision' seems to have been contested. In 1688 Margaret Storey petitioned Northumberland quarter sessions requesting that her husband be bound over to keep the peace. Enumerating his acts of violence, she also recounted that 'when she p[ro]vided him with meat [he] did dash it about her head and ... did give it to ye dogs whereas he would not allow his said wife necessary food for her selfe and childe'.⁹¹ Even more crucial is the wording of the numerous complaints made by wives, which provides convincing evidence that wives did not see their role in maintaining a family as merely supplementary to that of their husbands. Many who complained about the lack of provision during cohabitation defined men as contributors or as assistants. One example will have to suffice here. In 1740 Elizabeth Bell sought to have her husband bound over to keep the peace and to 'continue with and *assist* in the Provision for and maintenance of her ... and their said children' (*italics mine*).⁹² Wives who claimed that their husbands refused them maintenance during separation also cast it as a supplement to their own means of gaining a living. In sum, coverture placed boundaries on commercial activities within which married women's purchasing, provisioning and assisting in maintaining a family and household through their earnings and labour were fairly broad and flexible.

ATTITUDES TOWARDS PROPERTY OWNERSHIP
WITHIN MARRIAGE

Married women's material contributions and their participation in consumption raise questions about their attitudes towards ownership during matrimony. It is possible to surmise that women had strong feelings about their possessions before marriage, since they accumulated them in a very personal and intimate way through a combination of earnings from several years of hard work, scrimping and saving and gifts and inheritances from loved ones, whether parents, relatives or former husbands.⁹³ Many also arranged their portions themselves, particularly as widows. Thus some wives felt that the property they brought to marriage gave them a stake in what it was used to purchase. Mary Giles' £50 portion was used to buy the house and lands costing £130 in which she and her new husband lived. This gave her a strong sense of ownership about the investment. The fourth article in her plea for separation on the grounds of cruelty, initiated in 1744, claimed that Henry turned her out of the house 'tho' the same was bought w[i]th her own money'.⁹⁴ Another indication that some wives believed the portion they brought to marriage remained in their possession is that 4 per cent of the secondary complaints (14 out of 365) were made by wives who alleged that their husbands had disposed of 'their' property after marriage or kept 'their' property during separation. It is clear from the context of these statements that the goods were not secured to wives by any formal legal means. Anne Tomlinson complained about her husband to Northumberland quarter sessions in 1719 because he was cruel, had turned her out and refused to maintain her, while maliciously preventing her from earning her own living. She also stated that he had 'broke open her Cupboards and disposed of her Linnen and other household goods and her whole stock of Cattle' and then turned her out. Yet her earlier sentences show that she brought these goods to marriage so legally her husband owned them outright.⁹⁵

We know that at widowhood many women, including those of humble social status and means, expected to receive back some or most of their portion or understood that it would be inherited by their offspring, or returned to their natal family if they had no issue.⁹⁶ This can be seen in early modern inventories, where 'it is clear that goods considered the wife's were not always included in the husband's inventory even though he technically owned them'; in 1621 Janevive Deane marked her goods 'that soe shee might still keep hir owne stock and goodes whole, in apparancie to the worlde'.⁹⁷ The records of marital difficulties add to our knowledge by showing what women felt about their property at separation. Of the secondary complaints 15 per cent were made by husbands accusing their wives

of conveying away property from the marital home. The goods that they took were useful and/or valuable. The most common items taken were 'household goods', a term probably describing general workaday items. Next they removed linen and bedding and they also took their clothing. The next category of goods was described as 'things of value' and perhaps included decorative or luxury items. Wives also took silver plate and cash, and were accused of removing jewellery, household furniture, gold and papers, writings and securities.⁹⁸

The types of goods women removed raise questions about their motivation for taking them. Obviously many of the items were functional, indicating that wives took them because they needed them. In addition many were valuable: clothing was expensive and, like linen, bedding and household goods, was essential for a new household or could be sold or pawned to raise money. No doubt this is why wives also took their husbands' clothes. Cash provided security and short-term purchasing power. Wives may also have been taking advantage of their immunity from prosecution. *The laws respecting women* stated that a 'wife cannot herself take away her husband's goods feloniously, and if she takes them away, and delivers them to a stranger, it is no felony in the stranger'.⁹⁹ It could be argued, therefore, that wives removed items simply because they wanted them. Yet the women may have felt an instinctive sense of ownership for some of these goods. It would not be surprising if they had quasi-legitimate feelings of possession for their clothing, jewellery and plate, which were defined as paraphernalia and returned to them at widowhood if their husbands had not already sold them, unlike their other personal property.¹⁰⁰ Many moveable goods were in the household domain, which perhaps added to married women's sense of ownership. It is significant in this light that, when household goods and clothes were stolen, wives frequently reported the theft and gave evidence at trials, though of course it was their husbands who were named as the legal owners of the property.¹⁰¹ Moreover, the goods that women removed were often those that they had brought as a portion. In 1769 Joseph Fleming's advert accused his wife of carrying away all the pewter and linen, a clock and other things of value that she brought to their recent marriage.¹⁰² Furthermore, many of the goods that wives removed were those in which women invested deep emotional value. Maxine Berg, for example, comments that 'Clothes, light furnishings, marked and table linens, tea ware and china were for women personal and expressive goods, conveying identity, personality and fashion.'¹⁰³

It is pertinent that when wives responded to these claims they rejected their husbands' allegations and explained that they had taken their own property (which was not theirs at law due to separate estate) either because they owned it before marriage or had purchased it during the marriage.¹⁰⁴

In 1756 Archibald Bowie, a wherryman in South Shields, advertised that he would not pay his wife's debts because she had eloped and taken a sum of money with her. She indignantly advertised that 'he charges me with eloping from him with a certain Sum of Money which Sum was 22s 6d as can be proved by my credible Neighbours, he at the same Time, having received with me Goods to the Value of £12'.¹⁰⁵ She felt she was entitled to the money because she had supplied a larger sum at marriage; she also expected others to share her opinion. Elizabeth Harding, of Seaham, wrote to her proctor (her lawyer in the ecclesiastical court) in 1742, describing how her violent husband accused her of stealing his goods. She explained that she had only taken 'my leneng [linen] and plate & solum thens of valey [things of value] tha wer not of hes bying'.¹⁰⁶ In her view, purchasing the goods meant that she owned them. Earnings and labour may also have provided married women with a sense of possession. Susanna Rigsby of Newport Pagnell supplied her husband with bone lace, which he sold on in London. She objected when he took to squandering the money that he received, returning home once he had run out of cash to be re-supplied by her. This was not because she felt that she should be maintained by him, rather she felt that she owned the money which her work produced.¹⁰⁷ The complex motivations encompassing need and possession are illustrated by Grace Allenson's response in 1676 to her husband's detailed description of goods that she had removed. Grace admitted taking the goods when her husband ejected her from their house and explained why she felt that they belonged to her. The lace was taken from her wedding gown and the ribbons were 'old' and came from her wearing apparel. Her husband gave her the diamond ring before marriage and it was 'usually worn on her finger' as were the other three rings. The bracelets and watch were also hers before marriage.¹⁰⁸ The rest of the linen was necessary because she had been pregnant when she left and the childbed linen, mantle and other similarly appropriate items were returned to her husband after her lying-in period. In other words, women took the goods that they had habitually used, worn, received as gifts, purchased in person and, perhaps, when they had earned the money that helped pay for them.

So, if married women did not entirely suspend their feelings about owning a variety of moveable goods, how did they deal with these emotions during marriage? It is common to find wives' statements referring to 'their' goods, ranging from houses to occupational tools. Sarah North's article of the peace – a written complaint requesting surety for the peace – against her husband John, a butcher of Twyford, displayed at the Epiphany sessions of 1788, referred routinely to 'their' bellows and 'their' dwelling house. Susannah Rigsby referred to the marital home as 'their' house.¹⁰⁹ Wives seem to have thought about their goods in the same way that men

did. Michael Mascuch's analysis of middling-sort identity, based on mainly male autobiographies written between 1600 and 1750, concludes that 'the act of making the family secure in an unstable physical environment informed the [middling-sort] ethos'. These men were deeply concerned to protect their children and secure their future livelihoods. This motivated their consumption habits and ensured that land and moveable goods were valuable in terms of family sustenance rather than personal profit.¹¹⁰ Both married women and married men therefore conceptualized their contributions and property as pooled for familial and household benefit, rather than coming into the sole possession of the husband.

For this reason some husbands described their wives' goods separately from their own when their marriages broke down, instead of keeping them as they were technically entitled to do. William Eshelby of Ripon, Yorkshire, refused to pay his wife's debts because she had eloped with all 'her' necessaries and wearing apparel.¹¹¹ Thomas Forster of Bywell in Northumberland stated in 1771 that when his wife left she took with her 'such part of the Household Goods as properly belonged to herself'.¹¹² Some differentiated between their own and their wives' goods. In response to his wife's separation suit in 1729, James Currie, a curate in Bromfield, Cumberland, accused her of conveying away all her property that was her own before marriage, 'but also several goods which belonged to [him] before the said marriage'.¹¹³ However, interdependence sometimes collapsed when couples experienced conflict. As the violent Charles Allenson's demands illustrate, some men were prepared to exert their full legal rights of ownership, in this case to the point of insisting that baby linen be returned to him.¹¹⁴ Yet, even in marital breakdown, men phrased their demands for the return of property taken by wives to emphasize that they needed it in order to remain solvent, bring up their children or to pay their wives' alimony, rather than simply because it was legally theirs.¹¹⁵ It is possible that popular opinion leaned towards the view that goods were pooled for mutual benefit, since husbands were criticized for removing or wasting the property their wives brought to marriage. James Anderson went so far as to place an advert in 1768 because 'it is currently reported, to the Disadvantage of my Character, that I had either expected more with her [his wife], or wasted what she brought me; whereas to this Day, I know not what she has, nor never found Fault, nor spent One Penny of her Substance'.¹¹⁶

CONCLUSION

The anonymous author of *The hardships of the English laws in relation to wives* acknowledged in 1735 that 'by the Favour of their Husbands, [wives] are still in a State of *Existence*', although she reminded the reader

that a wife was still 'in the Condition of a Slave, tho' she is not treated as such'.¹¹⁷ Amy Erickson has recently echoed *The hardships* by observing that a woman's economic security rested upon her husband's good will, though some women inherited property and exercised control over it.¹¹⁸ There is no doubt that a husband could disrupt his wife's economic life, but as the advertisements show, men's economic independence was also qualified. Despite their superior position in law and economic autonomy, men's credit, in both its financial and social meanings, was contingent upon their wives' economic credit and trading reputation, as well as their good will.¹¹⁹ Margaret Hunt has commented that men 'monopolized most of the material resources' in marriage and women owned nothing of their own.¹²⁰ Yet there is evidence that wives expected to have control over household resources and retained some sense of possession over moveable goods during marriage, at the same time as willingly putting these goods to familial and household use.

The author of *The hardships* also concluded that 'some Wives have so little Apprehension of this Law of *Annihilation*, that they are in Fact the *freer* Agents of the two'.¹²¹ Margot Finn uses the example of Millicent Garrett Fawcett's shock, in the 1870s, on hearing her stolen purse described in court as the property of her husband to illustrate that the 'habitual, vital economic activities in the practice of her daily life' were very different to the theory of coverture.¹²² It is also clear that some eighteenth-century wives were unaware of the extent to which they were technically economically dependent upon their husbands. In 1774 Catherine Hall placed an advert in response to her husband's advert which denied her the use of his credit after she had eloped. She pointed out that in fact he had turned her out, 'and as for People not trusting me, I think he might have let that alone till I had contracted any Debt. – Such Usage was then a hidden Thing to me.'¹²³ This does raise the question of how she made purchases during marriage and separation without using her husband's credit. Yet the routine legal techniques and informal means women used to safeguard their property at marriage and the regular public announcements in which husbands refused to settle their wives' debts indicate that not all could have been ignorant of coverture's restrictions. In 1731 William Morrison gave notice that his eloped wife 'threatens to borrow Money, and take up Goods upon the Credit of her said Husband', implying that a few wives even threatened to use the law of agency to their husband's detriment.¹²⁴

Hunt has shown that London wives had strong notions about their rights in marriage and indicates that their experiences did not follow coverture to the letter. But these were not 'unorthodox' attitudes, as she suggests, for women from rural and agricultural counties and areas in the throes of early industrialization had similar perceptions and experiences.¹²⁵

Further research is needed before firm conclusions can be drawn, but it is likely that wives did not think that their conduct was illegitimate, because it was in fact facilitated by coverture and the legal devices that allowed it to function. We have seen that, at the same time as the common law placed restrictions upon married women entering contracts, it integrated them into commercial life for domestic and business purposes through the law of agency.¹²⁶ The law of agency allowed wives to purchase a range of goods and, while the legal definition of agency conferred the authority to make financial contracts on behalf of others without ownership or partnership rights, the marital relationship added other dimensions in which women might feel that they had contributed enough to warrant ownership. We can also wonder whether wives' instinctive sense of possession was facilitated by the overlapping bodies of law, which enabled them to protect certain rights. The various legal formulae to protect portions during and after marriage may also have encouraged wives to perceive various goods as their own during marriage, though they used them for the benefit of their families. Perhaps it is time to move towards viewing such opinions as standard rather than exceptional.

ACKNOWLEDGEMENTS

I would like to thank Toby Osbourne and members of the pre-industrial seminar at the University of Durham who heard an earlier version of this article. I am also indebted to Rebecca King, Mark Bailey and Lilian Begiato for their perceptive comments and to the anonymous reviewers of this journal for their stimulating criticism.

ENDNOTES

- 1 Anon., *Baron and feme, a treatise of the common law concerning husbands and wives* (London, 1700), 4; Anon., *A treatise of feme covert: or, the lady's law containing all the laws and statutes relating to women* (London, 1732), 78, 81; Anon., *The laws respecting women, as they regard their natural rights, or their connections and conduct* (London, 1777), vi.
- 2 M. E. Doggett, *Marriage, wife-beating and the law in Victorian England* (London, 1992), chapter 3.
- 3 *Laws respecting women*, 65.
- 4 For fuller details, see *A treatise of feme covert*, section beginning 52. Women's legal status is discussed in A. L. Erickson, *Women and property in early modern England* (London, 1993), and T. Stretton, *Women waging law in Elizabethan England* (Cambridge, 1998).
- 5 For example *A treatise of feme covert*, 78–83.
- 6 *Laws respecting women*, 68.
- 7 *Laws respecting women*, xi, 54.
- 8 There were exceptions to this general rule; see *Laws respecting women*, 70, 346.
- 9 Anon., *The hardships of the English laws in relation to wives* (London, 1735), 2–5. For its authorship see Erickson, *Women and property*, 21.

- 10 *Hardships*, 25–46.
- 11 *Hardships*, 27–9. Roman civil law influenced English ecclesiastical law; see Erickson, *Women and property*, 5.
- 12 Erickson, *Women and property*, 233.
- 13 Both *The hardships* and the 'Remarks' were printed in *The Gentleman's Magazine* 5 (1735) and 6 (1736), 648–50 (hereafter *GM*).
- 14 'Remarks', *GM*, 650. Other male writers who commented on the continental law of property tended to discuss the gap between law and practice; see Erickson, *Women and property*, 108–9.
- 15 For reviews of the historiography of women's legal status, see Stretton, *Women waging law*, 21–5, and W. Prest, 'Law and women's rights in early modern England', *The Seventeenth Century* (1991), 169–87.
- 16 *Hardships*, 51.
- 17 Stretton, *Women waging law*, 25; Erickson, *Women and property*, 5–6.
- 18 For example see J. Bailey, *Unquiet lives: marriage and marriage difficulties in England, 1660–1800* (forthcoming, 2003), chapter 3; M. Finn, 'Women, Consumption and Coverture in England, c. 1760–1860', *The Historical Journal* 39, 3 (1996), 702–22; L. Gowing, *Domestic dangers: women, words, and sex in early modern London* (Oxford, 1996); M. Hunt, 'Wives and marital "rights" in the Court of Exchequer in the early eighteenth century', in Griffiths and M. S. R. Jenner, *Londinopolis: essays in the cultural and social history of early modern London* (Manchester, 2000); T. Meldrum, 'A women's court in London: defamation at the Bishop of London's consistory court, 1700–1745', *London Journal* 19, 1 (1994), 1–20; A. Shepard, 'Manhood, credit and patriarchy in early modern England c. 1580–1640', *Past & Present* 167 (2000); R. B. Shoemaker, *Prosecution and punishment, petty crime and the law in London and rural Middlesex, c. 1660–1725* (Cambridge, 1991); and Stretton, *Women waging law*.
- 19 Erickson, *Women and property*, 15, 19, 150.
- 20 C. Churches, 'Women and property in early modern England: a case-study', *Social History* 23, 2 (1998), iv.
- 21 M. Berg, 'Women's consumption and the industrial classes of eighteenth-century England', *Journal of Social History* 30, 2 (1996), 415–34; M. Berg, *The age of manufactures, 1700–1820: industry, innovation and work in Britain* (Oxford, 1985), 169–72; A. Vickery, *The gentleman's daughter: women's lives in Georgian England* (London, 1998), 164–8; H. Berry, 'Prudent luxury: the metropolitan tastes of Judith Baker, Durham gentlewoman', in Lane and R. Sweet eds., *'On the town': women and urban life in eighteenth-century England* (forthcoming, 2003).
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- 23 Finn, 'Women, consumption and coverture', 66–70.
- 24 L. Weatherill, 'A possession of one's own: women and consumer behaviour in England, 1660–1740', *Journal of British Studies* 25 (1986), 131–56.
- 25 Berg, 'Women's consumption'; A. Vickery, 'Women and the world of goods: a Lancashire consumer and her possessions, 1751–81' in J. Brewer and R. Porter eds., *Consumption and the world of goods* (London, 1993).
- 26 J. Kermode and G. Walker eds., *Women, crime and the courts in early modern England* (London, 1995), 9, and G. Walker 'Women, theft and the world of stolen goods', in Kermode and Walker, *Women, crime and the courts*, 88–91.
- 27 Berry, 'Prudent luxury', passim; Vickery, *Gentleman's daughter*, 183–94.
- 28 M. Prior, 'Wives and wills 1558–1700', in J. Chartres and D. Hey eds., *English rural society 1500–1800* (Cambridge, 1990); Erickson, *Women and property*, 139–43.

- 29 Erickson, *Women and property*, 129–30, 150.
- 30 On separate estate see S. Staves, 'Separate maintenance contracts', *Eighteenth Century Life* 11 (1987), 78–101.
- 31 Erickson, *Women and property*, 226.
- 32 A more detailed breakdown of these sources is provided in Bailey, *Unquiet lives*, chapter 2.
- 33 *Laws respecting women*, 68; *A treatise of feme covert*s, 90.
- 34 *A treatise of feme covert*s, 91; J. H. Baker, *An introduction to English legal history* (London, 1979), 398.
- 35 *Laws respecting women*, 66–9; *A treatise of feme covert*s, 91–2; R. Burn, *The justice of the peace and parish officer*, 4 vols, 15th edn (London, 1785), 381–4.
- 36 *A treatise of feme covert*s, 91, 92; *Laws respecting women*, 66.
- 37 R. Burn, *Ecclesiastical law*, 2 vols (London, 1763), vol. 2, 44.
- 38 For a discussion of these adverts see Bailey, *Unquiet lives*, chapter 3.
- 39 Finn, 'Women, consumption and coverture', 710–14.
- 40 *The York Courant*, 27 June 1749, 1.
- 41 *The Newcastle Chronicle*, 27 August 1771, 1.
- 42 *The York Courant*, 27 June 1749, 1.
- 43 *The Newcastle Chronicle*, 24 September 1768, 3.
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- 49 L. T. Ulrich, *A midwife's tale: the life of Martha Ballard, based on her diary, 1785–1812* (New York, 1991 edn), 29–30, 76, 77, 84–6, 247.
- 50 Borthwick Institute of Historical Research (hereafter BIHR), CP.I/187, *Sayer c. Sayer*, 1711.
- 51 Ulrich, *A midwife's tale*, 84, 343.
- 52 Stretton, *Women waging law*, 30–1; N. Pullin, 'Legal fictions v. legal facts: common law, coverture and married women in business', unpublished paper delivered to Graduate Research Seminar, University of Oxford, 2002.
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- 56 Vickery, 'Women and the world of goods', 274–80, and *Gentleman's daughter*, 161–3.
- 57 For example, see *GM*, vol. 2, 1732, 753; vol. 3, 1733, 645; vol. 4, 1734, 130–1.
- 58 Vickery, 'Women and the world of goods', 274–81, and *Gentleman's daughter*, 162–4; for men's purchasing see M. Finn, 'Men's things: masculine possession in the consumer revolution', *Social History* 25, 2 (2000), 133–55.
- 59 Finn, 'Women, consumption and coverture', 710; *Laws respecting women*, 66.
- 60 *The York Chronicle*, 18 July 1793, 2.
- 61 BIHR, Trans. CP.1709/2, *Wood c. Wood*.
- 62 BIHR, CP.H/4505, *Pighells c. Pighells*, 1697; BIHR, CP.I/812, *Walker c. Walker*, 1723.

- 63 D. Defoe, *The complete English tradesman* (London, 1727), vol. 2, 132. Also see *The Newcastle Courant*, 3 January 1767, 2.
- 64 Northumberland Record Office (hereafter NRO), QSB 75, fols 22, 23.
- 65 See P. Langford, *A polite and commercial people: England 1727–1783*, 2nd edition (Oxford, 1989), 76, and O. Hufton, *The prospect before her: a history of women in western Europe, 1500–1800* (London, 1995), 153.
- 66 See Bailey, *Unquiet lives*, chapter 5.
- 67 Shepard, 'Credit, manhood and patriarchy', 91.
- 68 W. S. Holdsworth, *A history of English law*, 17 vols (London, 1924–38), vol. 8, 222–9.
- 69 *The York Chronicle*, 23 September 1785, 3.
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- 80 *The Newcastle Journal*, 2 June 1744, 3.
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- 82 The theory that provision was men's legal responsibility to their wives, compensating for what women lost under coverture, lasted until the second half of the twentieth century; see K. O'Donovan, 'The male appendage – legal definitions of women', in S. Burman ed., *Fit work for women* (London, 1979), 141.
- 83 Erickson, *Women and property*, 25–6.
- 84 *A treatise of feme coverts*, 209.
- 85 Durham Diocesan Records (hereafter DDR)/EJ/PRC/2/1744/11, *Giles c. Giles*.
- 86 The introduction of this type of set proportion of jointure to portion has been interpreted as an attempt to reduce women's entitlement to property during widowhood; see Stretton, *Women waging law*, 32.
- 87 Hunt, 'Wives and marital "rights"', 117.
- 88 J. C. Atkinson ed., *The North Riding Record Society, Quarter Sessions Records* (London, 1888), vol. 6, 182.
- 89 *Jackson's Oxford Journal*, 1 May 1773, 3.
- 90 O'Donovan, 'Male appendage', 141.
- 91 NRO, QSB/5, fols 14–15.
- 92 My emphasis. North Yorkshire County Record Office, QSB/1741, information 30 August, MIC 133.
- 93 Erickson, *Women and property*, 85.
- 94 DDR/EJ/PRC/2/1744/11, *Giles c. Giles*.
- 95 NRO, QSB 57, fol. 57, Anne Tomlinson's information.
- 96 Erickson, *Women and property*, 85–6, 150, 184–5; Hunt, 'Wives and marital "rights"', 119.
- 97 Erickson, *Women and property*, 145, 226.

- 98 For a more detailed description of goods women removed see Bailey, *Unquiet lives*, chapter 5.
- 99 *Laws respecting women*, 71.
- 100 *A treatise of feme covert*, 80. Wives could get their clothing returned to them in marital difficulties; see DDR/EJ/PRC/2/1765/3, *Allison c. Allison*, letter dated 20 March 1766.
- 101 Walker, 'Women, theft and the world of stolen goods', 90.
- 102 *The Newcastle Chronicle*, 4 February 1769, 3.
- 103 Berg, 'Women's consumption', 421.
- 104 Other studies reveal similar findings; see Hunt, 'Wives and marital "rights"', 115.
- 105 *The Newcastle Journal*, 31 January 1756, 3; 7 February 1756, 3.
- 106 DDR/EJ/PRC/2/1742/5, *Harding c. Harding*.
- 107 Centre for Buckinghamshire Studies (hereafter CBS), QS Rolls, Michaelmas, 1755, Susanna's examination.
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- 111 *The York Courant*, 18 June 1765, 2.
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- 113 BIHR, Trans.CP.1730/6, *Currie c. Currie*.
- 114 BIHR, CP.H/3264, *Allenson c. Allenson*, 1675.
- 115 Bailey, *Unquiet lives*, chapter 5.
- 116 Jane Anderson confirmed her husband's account in a second part to the advert; see *The Newcastle Journal*, 4–11 June 1768, 2.
- 117 *Hardships*, 46, 52.
- 118 Erickson, *Women and property*, 19–20; Stretton, *Women waging law*, 36, 237.
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- 121 *Hardships*, 52.
- 122 Finn, 'Women, consumption and coverture', 722.
- 123 *Jackson's Oxford Journal*, 28 May 1774, 2; 18 June 1774, 3.
- 124 *The Newcastle Courant*, 12 June 1731, 3.
- 125 Hunt, 'Wives and marital "rights"', 118–21, 123–5.
- 126 Finn, 'Women, consumption and coverture', 720.