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## Performing Early Modern Libel: Expanding the Boundaries of Performance

*This essay focuses on provincial libel cases between private individuals tried at the court of Star Chamber during the early seventeenth century. Libelling saw personal scandals creatively couched in verses, visual symbols, or mock-ceremonies, and read, sung, and posted in early modern communities. This essay identifies a range of ‘manners’ of libel, and compares a libellous ‘Stage plaie’ to a set of libellous mock-proclamations and a ‘book’ of playing card knaves. The essay argues that libels should be understood as functioning on a spectrum of performance. They should therefore prompt an expansion of the boundaries of early performance.*

‘It hath ever been agreed, that it is not the matter  
but the manner which is punishable’  
William Hudson, ‘Of Libelling’.<sup>1</sup>

Libelling, or the public dissemination of information that was damaging to a person’s reputation, saw personal scandals creatively couched in verses, elaborate visual symbols, or mock ceremonies, and read, sung, posted, and published in local communities during the early modern period. In the quotation above, barrister and authority on the Jacobean Star Chamber William Hudson is dispelling one of the myths of the court’s principles when it comes to the trial of libels: that a public communication was not libellous if it was true. Hudson stresses that this was not the case. He is eager to establish that the truth or falsity of the statement was not what mattered in the Star Chamber trial of libel during the early modern period because true statements were as likely as false ones to result in a breach of the peace. For Hudson and the early modern Star Chamber it was the manner in which libellous statements were made public that was the key to their criminality. What Hudson means by the ‘manner’ of libel is encapsulated in his definition of

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libel according to the specific methods by which they were publicly communicated, and the kinds of crafted forms they took: reading verses aloud, sending defamatory letters, enacting public impersonations, and posting up symbols or images in significant public spaces. This essay argues that we should pay more heed to Hudson's assertion about the *manner* of libelling when reconsidering what constitutes performance in early modern provincial communities. For this essay, Hudson's emphasis on the manner of libelling allows us to see the public communication of elaborate, pre-planned messages through the eyes of early modern contemporaries as a kind of performance. I use the term 'performance' deliberately here, for this is certainly a widening of the traditional boundaries of what is considered drama or theatre.

This essay takes as its focus the libel of private individuals, which was newly criminalized by the Star Chamber in the 1590s.<sup>2</sup> Such libelling reached 'near-epidemic proportions' throughout the provinces during the first decades of the seventeenth century, and has been the subject of invaluable studies by historians such as Adam Fox and David Underdown.<sup>3</sup> Certain cases were also recognized by earlier scholarship as records of performance, although these tended to be cases reflecting the practices and texts most closely associated with the commercial London theatres. For example, *Hole vs White*, a notorious case from Wells, Somerset (1607–08), featured in C.J. Sisson's *Lost Plays of Shakespeare's Age* because one witness had seen the defendant, Williams, recite a libellous verse 'which speech he deliuered with the action of his foote [&c] and hand, much like a player.'<sup>4</sup> Williams's verse featured a ridiculous caricature of an authority figure (an impersonation of two of Wells's unpopular officials) whose speech mimicked a line from Marlowe's *Tamburlaine the Great, Part 2*: 'What holla ho? yee pampered Asian Jades.'<sup>5</sup> Why the witness thought the verse 'had bene a parte of some play' is not hard to see, nor is it difficult to grasp, therefore, why the case has attracted more attention than most others.<sup>6</sup>

More recently, a number of Star Chamber cases centred around libel have been included in the Records of Early English Drama (REED) volumes, the long-standing editorial project that collates evidence of drama, music, and other communal entertainment from the Middle Ages until 1642, so the statement that libels should be considered as performance is not radical. However, there remain cases that currently fall outside of the remit of the REED volumes, which this essay will argue should be considered as performances, and incorporated into the study of early drama. Instead of recognizing only a selection of cases, the various 'manners' or forms and methods of libelling emphasized by Hudson need to be theorized more fully as functioning on a spectrum of performance.<sup>7</sup> Such a

spectrum of performance would include at one end libellous stage plays or interludes, those libels that were embedded in explicitly labelled forms of drama and performed in physical spaces designated as theatres, and at the other end publicly performative behaviours. In the middle would come such ‘manners’ as reading verse or prose texts aloud to spectators, enacting mock ceremonial or festive rituals, and posting up elaborately constructed visual symbols, all in spaces and places with specific communal meaning. More broadly, making space for libels in studies of early theatre might prompt a re-evaluation of where we draw the boundaries for what is considered as performance.

There is not space here to consider the full range of forms that early modern provincial libels took. This essay will examine one case featuring a libellous play, which has been accepted as drama and included in *REED: Lincolnshire*, and will compare it to another case featuring a mock proclamation and a libellous ‘book’ made of four knaves of playing cards. This second case is not currently included in *REED: Somerset* despite the inclusion of other cases in the volume, though it in fact can be understood as a performance. By comparing these two cases, this essay highlights the need to recognize a greater range of public communications in the provinces as performance-related, and therefore the need to redraw the boundaries for what is considered as evidence related to early theatre.

### Early Modern Libel

From its thirteenth-century origins, the medieval offence of defamation took two distinct forms: either as a moral transgression against private individuals tried in local church courts or, according to the Statute of Westminster, as a criminal offence targeting the monarch or magnates.<sup>8</sup> The punishment for defamation of private individuals in church courts was excommunication at the worst, but more commonly public apology. The criminal offence of spreading ‘false news’ against the monarch or government officials, however, was punishable by execution.<sup>9</sup>

During the 1590s, though, a series of high profile, precedential cases ensued and these were followed in 1605 by Sir Edward Coke’s landmark report on ‘The Case *de Libellis Famosis*’.<sup>10</sup> These developments led to the criminalization of private libel, which could then be tried at the court of Star Chamber, alongside cases relating to the slander of monarchy and government. The remarkable conflation and criminalization of private libel brought the ruination of individual reputations into the same legal realm as the circulation of false news of national concern. Thereafter the Star Chamber ‘became a natural forum for their redress’, where the nature of such libel was perceived differently because the offence fell under the

court's jurisdiction over breaches in the common peace. Treating libel as a threat to the common peace meant that the Star Chamber maintained, in contrast to common law courts, that truth was no defence, that sending a defamatory letter was itself a form of publication, and that the libel could still be prosecuted if the libelled person was dead.<sup>11</sup> All of these examples — libels that were true, sent as letters, or targeted a dead person — were as likely to result in breaches of the peace as their opposites, if not more so.

With the 'manner' of libel as performance in mind, what were the typical forms of libelling that the court now defined as criminal? William Hudson outlined these in his treatise on the court:

Libels they are of several kinds; either by scoffing at the person of another in rhyme, or by personating him, thereby to make him ridiculous; or by setting up horns at his gate, or by picturing him or describing him; or by writing some base and defamatory letter, and publishing the same to others ... or to publish disgraceful and false speeches against any eminent man or public officer.<sup>12</sup>

For the purposes of this essay, Hudson's use of the word 'personating' is particularly important. Whilst the term 'personate' refers to the satirical description of a person in writing, it was also used to refer to presenting someone in an assumed character, and specifically to an actor cast in a role, acting out a scene, or playing the part of a character in a play.<sup>13</sup> Hudson's use of this term captures the sense in which libelling of this kind worked by mimicking or parodying the libel target: such libels humiliated their targets by creating and enacting ridiculous personas of them. In Hudson's taxonomy of libels, personating equates with scoffing at a person in rhyme and posting up humiliating symbols, pictures, or descriptions of a person in public. That Hudson equates personating with the other forms he identifies should prompt us to consider not only the verse libels, written and read aloud in public spaces, but also the symbols such as horns, playing cards, and gallows that were fixed to market crosses, doorways, and land borders, as well as the mocking pageants, mock proclamations, and mock-court summons that feature in provincial libel as forms of semi-dramatic impersonation.

Some of these cases already feature in the REED volumes, but coverage is sporadic. Several of the earliest volumes published in the REED project do not include any Star Chamber libel cases.<sup>14</sup> More recent REED volumes do include libel cases where written verses are extant or where singing or music is reported, as well as those cases that explicitly describe libellous material as featuring in the context of recognized forms of drama, such as stage plays, interludes, or pageants.

A greater number of libel cases could be included in such resources, however, especially if we recognize a wider range of manners of libel as performances. Libels that mocked or parodied official ceremonies, such as royal proclamations, serve as one such manner.

### A Libellous Play

In the case of *Lincoln vs Dymocke*, Henry Clinton, the second earl of Lincoln, complained of being libelled by his nephews, Sir Edward and Tailboys Dymocke, and others in ‘a very infamous and libellous Stage plaie, acted on a Sabboath daie vppon a greene ... in vewe of 300 or 400 *persones* ... wherein they *personated* the said Earle in Apparell, speche, gesture and name’, in the village of South Kyme, Lincolnshire, in 1601.<sup>15</sup> The earl’s bill of complaint elaborates that:

Talboys Dymocke being the then principall actour ... did first ... Counterfeite and tooke vppon him to represent the person of *your* said Subiecte and his speaches and gesture and then & there in the said play tearmed & named *your* said ... Subiect the Earle of lincolne his good vncler in scornefull manner and as an actor ... representing the person of *your* said Subiecte in the said play was there fetcht away by the said Roger Bayard who acted and represented ... in the said playe the person and place of the diuell.<sup>16</sup>

Using costume, speech, gesture, and by naming him, Tailboys, the actor, played the earl as a character in the play. Moreover, the role acted by Roger Bayard, the devil character, constituted part of the libellous message: the earl character was carried away by the devil. The libel was fully embedded in the narrative play world and in the dramatic action of costumes and adopted personas. Lincoln further complained that:

Roger Boyard in an other *parte* of the said playe did then and there acte & represent the *parte* of the ffoole and the *parte* of the vyce ... and ... actinge the said *parte* did declare his last will & testament and ... in the hearing of all the *persons* assembled to see and heare the said playe did bequeathe his wooden dagger to ... the Earle of lincolne and his Cockscombe & bable vnto all those that would not goe to Hornecastle *with* the said Sir Edward Dymocke against him.<sup>17</sup>

The earl was further libelled by association with the vice or fool character. This particular declaration alludes to the central motif of Summer Lord plays, in

which the temporary lord of misrule dies and declares his last will and testament; in this instance, the earl was associated with folly by being the named inheritor of the vice's dagger.<sup>18</sup> Again, the actor's onstage role, as fool or vice character, made this statement libellous because the earl's name becomes synonymous with folly or vice by association with the identity of the character. Moreover, when the temporary Summer Lord figure of the play world dies, his immorality and misrule are a legacy left to the earl in the real world. The communal audience are directly invoked as active witnesses to and judges of the play's libellous message: all those who would not go with the group of libellers to occupy the earl's grounds at Horncastle, in other words those who did not side with the libellers in the dispute, were branded fools in receipt of the coxcomb and bauble. As well as drawing the earl and the audience into the play world, these insults relied on symbolic stage props — the dagger, coxcomb, and bauble — for libellous meaning.

Lincoln's bill of complaint lists other notable libellous elements in the play. He alleges that one of the actors played a minister and delivered a mock sermon whilst drinking ale; that the actors sang a dirge song naming 'known lewde & licencious woemen'; and that they fixed a written verse libel about the earl to the maypole on stage directly beneath a picture of a bull, which alluded to the earl's coat of arms.<sup>19</sup> The inclusion of this case in the REED volume is uncontroversial: it features multiple libellous elements embedded in the play world narrative and the moral framework of a 'Stage plaie'.

From this case we can see that gesture, costume, props, mode of speech, actor identity, narrative elements, communal location, and an active communal audience are important characteristics of a recognized libellous performance. However, this case further demonstrates that a mixture of written, oral, and visual forms — the mock-sermon, song, written verse, coat of arms, symbolic props — also all played a part in this 'Stage plaie' or 'enterlude' setting. These other forms, such as verse, images, symbolic props, and mock ceremonies, either on their own or in various combinations, proliferate in the records of provincial libel. Although many of these other cases do not feature what we might consider an explicit 'stage play' framework, the inclusion of these other forms within the drama in South Kyme should alert us not only to their suitability as theatrical content, but also to the associations that they would have had with theatrical events in the eyes of early modern spectators. If a libel recreated what was effectively an extract from stage play — whether orally or visually — in the same location albeit independently from the theatrical framework of a specified occasion upon which 'drama' would be explicitly and legitimately enacted, then we should consider to what

extent an early modern community might understand it as inherently associated with a context of theatrical performance.

### **Borderlines**

*REED*: *Somerset* does not include the case of Whetcombe vs Prowse, in Nether Stowey, Somerset (1607), despite the collection including numerous libel cases, and in particular the 1607 Wells case of Hole vs White introduced above. This latter infamous case revolved around the city of Wells's regular May pageants, which included a Lord of the May, Robin Hood, the Pinner of Wakefield Green, and St George and the Dragon. However, in 1607 the regular May pageants were accompanied by a set of libellous pageants that featured men in costume riding horses impersonating prominent town officials.<sup>20</sup> The case also included a libellous 'Holing Game' and two separate verses, one a song and the other the dramatic monologue delivered by William Williams described above. Somerset's REED volumes, then, do capture some of the variation and vibrancy of libels as a genre, but the case below does not feature.

In 1607 Edmund Whetcombe, a merchant, complained that Andrew Prowse, a local gentleman, and others including the town's bailiff and constable, had launched a two-pronged libellous attack on his reputation. In the first episode, the defendants were said to have procured and directed 'Twoe vagraunt persons' also described as 'strangers' to go to Nether Stowey's market cross on market day, 7 April 1606, to deliver a libellous proclamation.<sup>21</sup> The bill of complaint stresses that they repaired to the usual place for the delivery of royal proclamations on behalf of the king and that they 'made an (Oyes) once Twyse or Thrice'.<sup>22</sup> It alleges that the town's constable and bailiff, in order to give the impression that this was a legitimate proclamation, 'stooed rounde about him that made the same *proclamacion* with their hatts in their hands and their heads vncovered making shewe to the people that some greate matter was ther to be *proclaymed* for your *Majesties* Serveyce'.<sup>23</sup> Having gathered a large and expectant crowd, one of the vagrants 'with a loude voyce' and 'out of certaine instructions ... beforehande given to the said Cryer for his *Dyreccion*' took to the market cross and declared: 'That all manner of person and persons that haue any olde Shredds of Leather olde Ropes olde Clowtes or any olde bootes or shoes Lett them repayre to Edmunde Whetcombe ... whom they haue termed by the name of Edmunde Whetcombe Pedler and they shall haue vtterance for their said wares (God saue the Kinge)'.<sup>24</sup>

This enactment was effective as a parody of a royal proclamation because of its location at the market cross and its imitation of the characteristic oral signals for proclamations, the 'Oyes' and 'God save the king', which were clearly pre-scripted. However, the constable and bailiff who had been privy to the preplanning also modelled the kind of spectator behaviour that they wanted from the crowd in their removal of hats and standing to attention. Furthermore, the identity of the speakers as vagrants was crucial to the libellous meaning of the proclamation. The message of the publication is that Whetcombe, who described himself as a merchant, was in fact a peddler — someone of low and mobile status. To have vagrants make a mock proclamation highlights the carnivalesque inversion that a mock royal proclamation epitomizes, but it also associates Whetcombe, as a peddler, with another member of the low status, mobile class: the vagrant.

In depositions, it was the identity of the proclaimers that stood out to witnesses. Witness John Kingslande, a victualler, said: 'that he doth not know the name of either of the *said* straungers nor where they ... dwelled but as is was reported the <sup>^</sup> [*said*] straungers then came to Nether Stowey ... to gather monie for a Towne in Devonsheire'.<sup>25</sup> John White, a husbandman, concurred with Kingslande except that he thought they came on behalf of a town in Cornwall.<sup>26</sup> Although they disagreed on where the strangers came from, both witnesses noticed that these strangers were unknown — from outside of the community and county. They therefore represented threatening mobility and requests for money. The identity of the actors making the proclamation, and its libellous implications for Edmund Whetcombe, was what most struck the local audience. Vagrancy was a source of much anxiety in the early modern provinces for the potential extra costs it could place on parish funds, but vagrants were also associated with the dangerous circulation of rumours, sedition, and false news during this period.<sup>27</sup> In setting up such persons to make a mock royal proclamation against their enemy Edmund Whetcombe, the defendants in this case staged a powerful apparent confirmation of established stereotypes that preyed on provincial social anxieties. Just as in the case of *Lincoln vs Dymocke*, the identity of the actors here contributed part of the meaning of the libel, by associating the libel target with vice or low life. Performers, location, gesture, ceremonial framework, and spectator response were all part of the effective delivery of the mock proclamation.

### Multiple Unity

Within months, the defendants added a further, visually striking episode to their initial libellous proclamations. The bill of complaint alleges that the defendants:

Sithence the feaste of S. Michaell Tharkangell Laste paste did cause ... to be ... made a Lybell againste *your* said Subiect in wrightinge with a superscription thervpon directed vnto *your* said Subiect after the forme of a letter ... in these wordes. °Whetcombe:° I haue sent the here inclosed a booke of thy *profession* which is a fitt token to sende to such pedlinge gentlemen which carryeth about the Armes of their gentylitye in their pockett. Be not offended because thou haste the Style of Pedler ffor it is well knowne thy parentage were soe Although thou haste alreadye in thy heade the contentes of this booke yett keepe it saffe with thy armes of thy gentillity vntill thou heareste from me againe. In which Lybell ther were inclosed fflower knaves of the Cardes Two of them beinge Knaves of Spades and the other Two beinge knaves of hartes made vppe and sowed togeather after the forme of a booke and sent the same in disgrace to *your* said Subiect.<sup>28</sup>

This mocked up ‘book’ of the peddler’s profession must have taken some effort to construct; for one thing, it involved more than one pack of cards. It also combined the visually symbolic prop of the ‘book’ with a written element — the letter. This episode relies on written text to a greater extent than the mock proclamations, although those proclamations were orally delivered from a written script as a royal proclamation would have been. However, the playing card libel was also delivered orally before being publicly sent. Andrew Prowse’s deposition states that he and his wife were at home with Robert Jones, a gentleman, and his wife and servant, Thomas, when John Bourcher, also a local gentleman, arrived with the libel. Prowse admitted that the libel was read aloud to the company and that he thought it was Jones’s man, Thomas, who read it.<sup>29</sup> John Bourcher admitted that he and one other did create the libel, although he said it was not a libel but a legitimate reproof for Whetcombe’s ‘former vaine bragges in standing vpon his ^[pretended] gentility’.<sup>30</sup> Bourcher said he brought the libel to Prowse’s house where it was shown, and then he and Robert Jones’s wife ‘did send the same *lettre* by one Scott ... to be deliuered’ to Whetcombe.<sup>31</sup> The fact that the libel was written did not prevent it being read aloud to a gathered audience as entertainment on a significant feast day. The attendant social rituals associated with sealing and publicly delivering a letter, as represented and exploited dramatically in many plays of the period, accompanied this reading.<sup>32</sup>

The episode reiterates the same essential message as the proclamations: that Whetcombe was a peddler not a merchant and that he aspired beyond his station. In the second episode, however, the libel plays with a different range of associations. In contrast to the proclamation, the ‘book’ of knaves draws on symbols adapted both from everyday life and ephemeral print culture. In just one example

of the use of playing card iconography in printed pamphlets, the satires of Samuel Rowlands use the knaves of playing cards to satirize contemporary humours. *A Mery Metinge, or, 'Tis Mery when Knaves Mete* (1600) was condemned by bishops Whitgift and Bancroft and burned in October 1600.<sup>33</sup> However, this notoriety boosted publicity for the work and the text was reprinted as *The Knave of Clubbs* (1609), *The Knave of Hartes* (1613), and *More Knaves Yet? The Knaves of Spades and Diamonds* (1613?).<sup>34</sup> The title pages of the reprinted works feature images of the playing card knaves with their suits obviously visible, connecting the satirical allegory of topical humours with the familiar iconography of contemporary card decks.<sup>35</sup> I am not arguing for a direct connection between these satires and the Nether Stowey case; however, Rowlands's satires give an idea of the kind of satirical associations that the knaves of playing cards evoked during the period, and therefore of the kind of allusions that the libel might have been making to contemporary print media.

Each of the two episodes in the case of Whetcombe vs Prowse communicates a narrative that frames Whetcombe as a pedlar associated with low status: they make his claims to a mercantile reputation appear to be vain fabrications. The two episodes were enacted just months apart; taken together, the weight of rumour grows greater and the combination of multiple varying modes of communication from apparently separate sources gains credibility. In his landmark study of the transition from medieval to early modern theatre, David Bevington describes a kind of 'multiple unity' characteristic of early art and drama, which used repeated episodes, each 'self-sustaining' and equally important, to result in a 'mounting persuasiveness through varied restatements of basic truths'.<sup>36</sup> Similarly, multiple libellous scenes enacted at varied places and times within the community conveying the same basic message in a variety of familiar forms result in the seemingly inescapable conclusion that Whetcombe's status is, in fact, questionable. The libel's combinations of visual, verbal, and mock ceremonial delivery, as well as its mixture of gentlemanly status and authority with low, vagrant, and ridiculous humour, demanded actively to be deciphered by spectators. The audiences of libels, then, bear striking resemblances to the active and engaged spectators of early moralities, in which the boundaries between the real world and the play world are continuously collapsed in challenging ways. Moreover, with its mock proclamation, written letter, and symbolic visual 'knaves book' prop, this case contains a number of parallels with the South Kyme stage play, which along with the impersonation of the earl features a mock sermon and a written verse pinned to the maypole with a symbol from the earl's coat of arms.

When we consider that libel cases such as those explored above evidence a range of provincial performance-related activities, we discover a new genre of early modern popular performance. This genre has strong parallels with early festive culture and medieval theatre on the one hand, and with the mixed media characteristic of the early modern period on the other. From this perspective, libels demonstrate the need for a broader definition of what constituted performance in early modern England, a definition that places the manner — gesture, location, spectatorship, the parody of established forms — rather than the matter of content at its heart. Indeed, this essay asks for more careful consideration of the interconnectedness of the many and varied multimedia artefacts, such as libels, that featured in daily life across the provinces, with recognized forms of early theatre. As well as being embedded within provincial plays, such artefacts influenced and were influenced by a whole host of recognized dramatic forms from the staples of the London playhouses to the festive pageants of May Day.

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- 1 William Hudson, 'A Treatise of the Court of Star Chamber', in *Collectanea Juridica*, ed. F. Hargrave, 2 vols (London, 1791–1792), 2.1–240, 2.102. See also London, National Archives (NA) STAC 12/1.
- 2 This essay focuses on provincial libel between private individuals, as opposed to political libels, which engaged with prominent public figures and national issues. Such political libels differed in form and content to provincial private libels and have been studied extensively. See Alastair Bellany, 'Railing Rhymes Revisited: Libels, Scandals, and Early Stuart Politics', *History Compass* 5.4 (2007), 1136–79, <https://doi.org/10.1111/j.1478-0542.2007.00439.x>; Andrew McRae, *Literature, Satire and the Early Stuart State* (Cambridge, 2004), <https://doi.org/10.1017/cbo9780511483806>; and for an edition containing examples of such political libels see Alastair Bellany and Andrew McRae, eds, 'Early Stuart Libels: An Edition of Poetry from Manuscript Sources', *Early Modern Literary Studies*, Text Series I (2005) <http://purl.oclc.org/emls/texts/libels/>.
- 3 David Cressy, *Dangerous Talk: Scandalous, Seditious, and Treasonable Speech in Pre-Modern England* (Oxford, 2010), 35, <https://doi.org/10.1093/acprof:oso/9780199564804.001.0001>. See Adam Fox, *Oral and Literate*

- Culture in England 1500–1700* (New York, 2000), <https://doi.org/10.1093/acprof:oso/9780199251032.001.0001>; Martin Ingram, ‘Ridings, Rough Music and the “Reform of Popular Culture” in Early Modern England’, *Past & Present* 105.1 (1984), 79–113, <https://doi.org/10.1093/past/105.1.79>; David Underdown, *Fire From Heaven: Life in an English Town in the Seventeenth Century* (New Haven, 1992).
- 4 James Stokes and Robert J. Alexander, eds, *REED: Somerset*, 2 vols (Toronto, 1996), 1.354; Hole vs White (1607–8), NA STAC 8/161/1; C.J. Sisson, *The Lost Plays of Shakespeare’s Age* (Cambridge, 1936), 176.
  - 5 Stokes and Alexander, eds, *REED: Somerset*, 1.271–2, 2.710–11; James Stokes, ‘The Wells Shows of 1607’, in *Festive Drama: Papers from the Sixth Triennial Colloquium of the International Society for the Study of Medieval Theatre, Lancaster, 13–19 July, 1989*, ed. Meg Twycross (Suffolk, 1996), 145–56, 150. The line from Marlowe’s play, ‘Holla, ye pampered jades of Asia!’ (4.3.1) opens act 4 scene 3. The line was also parodied in Shakespeare’s *2 Henry IV* (2.4.143), and later in Jonson, Chapman, and Marston’s *Eastward Ho!* (2.1.82).
  - 6 Stokes and Alexander, *REED: Somerset*, 1.354. See also Stokes, ‘The Wells Shows’, 145–56; David Underdown, “But the Shows of their Street”: Civic Pageantry and Charivari in a Somerset Town, 1607’, *Journal of British Studies* 50.1 (2011), 4–23, <https://doi.org/10.1086/656631>. For other case studies see Ingram, ‘Ridings, Rough Music’; C.E. McGee, ‘Pocky Queans and Hornèd Knaves: Gender Stereotypes in Libelous Poems’, in *Oral Traditions and Gender in Early Modern Literary Texts*, ed. Mary Ellen Lamb and Karen Bamford (London, 2008), 139–51, <https://doi.org/10.4324/9781315247625>; Underdown, *Fire From Heaven*.
  - 7 This essay represents a small part of a book length study forthcoming by the author.
  - 8 Edward P. Cheyney, ‘The Court of Star Chamber’, *The American Historical Review* 18.4 (1913), 727–50, <https://doi.org/10.2307/1834768>; R.H. Helmholz, ed., *Select Cases on Defamation to 1600* (London, 1985); W.S. Holdsworth, *A History of English Law*, 17 vols (London, 1903–1924), 5.205–12; Lindsay Kaplan, *The Culture of Slander in Early Modern England* (Cambridge, 1997), <https://doi.org/10.1017/cbo9780511585593>; and Debora Shuger, *Censorship and Cultural Sensibility: The Regulation of Language in Tudor-Stuart England* (Philadelphia, 2006), <https://doi.org/10.9783/9780812203349>.
  - 9 David Ibbetson, ‘Edward Coke, Roman Law, and the Law of Libel’, in *The Oxford Handbook of English Law and Literature, 1500–1700*, ed. Lorna Hutson (Oxford, 2017), 487–506, 490, <https://doi.org/10.1093/oxfordhb/9780199660889.001.0001>.
  - 10 Fox, *Oral and Literate Culture*, 299–334; Alastair Bellany, ‘A Poem on the Archbishop’s Hearse: Puritanism, Libel and Sedition after the Hampton Court Conference’, *Journal of British Studies* 34.2 (1995), 137–64, <https://doi.org/10.1086/386072>.

- For Coke's report on 'The Case *de Libellis Famosis*' see *The Selected Writings and Speeches of Sir Edward Coke*, ed. Steve Sheppard, 3 vols (Indianapolis, 2003), 1.146–8.
- 11 Adam Fox, 'Ballads, Libels and Popular Ridicule in Jacobean England', *Past and Present* 145 (1994), 47–83, 55, <https://doi.org/10.1093/past/145.1.47>; Holdsworth, *History*, 5.207 and 210; Cheyney, 'Star Chamber', 733.
  - 12 Hudson, 'Treatise', 2.100.
  - 13 *Oxford English Dictionary Online (OED)*, s.v. 'personate, v'.
  - 14 See for example John Wasson, ed., *Records of Early English Drama: Devon* (Toronto, 1986).
  - 15 James Stokes, ed., *REED: Lincolnshire*, 2 vols (Toronto, 2009), 1.302. Lincoln vs Dymocke (1601), NA STAC 5/L1/29; 'Death of the Lord of Kyme, The', *Lost Plays Database*, last modified 16 September 2020, [https://lostplays.folger.edu/Death\\_of\\_the\\_Lord\\_of\\_Kyme\\_The](https://lostplays.folger.edu/Death_of_the_Lord_of_Kyme_The).
  - 16 Stokes, ed., *REED: Lincolnshire*, 1.271.
  - 17 *Ibid.* Edward Dymocke and others were alleged to have riotously broken into the parsonage at nearby Horncastle, owned by Lincoln, on 26 July (a month before the play) to claim 'divers duties of right'.
  - 18 For an example of the tradition, see Thomas Nashe's *Summer's Last Will and Testament*. See also Norreys Jephson O'Connor, *Godes Peace and the Queenes: Vicissitudes of a House, 1539–1615* (Cambridge, MA, 1934), 108–26, 118; C.L. Barber, *Shakespeare's Festive Comedy: A Study of Dramatic Form and its Relations to Social Customs*, 2nd edn (Princeton, 2012), 39–56, 49, <https://doi.org/10.23943/princeton/9780691149523.001.0001>.
  - 19 Stokes, ed., *REED: Lincolnshire*, 1.271–2.
  - 20 The case of Hole vs White was notorious in its own time, featuring in Hudson's treatise as an example: see Hudson, 'Treatise', 2.101.
  - 21 Whetcombe vs Prowse (1607), NA STAC 8/299/30, mb 28.
  - 22 *Ibid.*
  - 23 *Ibid.*
  - 24 *Ibid.* 'Utterance' was the disposal of goods by sale or barter.
  - 25 *Ibid.* Deposition Book, sheet 10.
  - 26 *Ibid.*, sheets 13–14.
  - 27 A.L. Beier, *Masterless Men: The Vagrancy Problem in England 1560–1640* (London, 1985); David Hitchcock, 'The Typology of Travellers: Migration, Justice, and Vagrancy in Warwickshire, 1670–1730', *Rural History* 23.1 (2012), 21–39, <https://doi.org/10.1017/s0956793311000136>; Chris R. Kyle, 'Monarch and Marketplace: Proclamations as News in Early Modern England', *Huntington Library Quarterly* 78.4 (2015), 771–87, 775, <https://doi.org/10.1353/hlq.2015.0029>.

- 28 NA STAC 8/299/30, mb 28.
- 29 Ibid, Deposition Book, sheets 37–38.
- 30 Ibid, sheet 46.
- 31 Ibid, sheet 47.
- 32 Gary Schneider, 'Libelous Letters in Elizabethan and Early Stuart England', *Modern Philology* 105.3 (2008), 475–509, <https://doi.org/10.1086/591258>; James Daybell, *The Material Letter in Early Modern England: Manuscript Letters and the Culture and Practices of Letter-Writing, 1512–1635* (Basingstoke, 2012), <https://doi.org/10.1057/9781137006066>; and Alan Stewart, *Shakespeare's Letters* (Oxford, 2008), <https://doi.org/10.1093/acprof:oso/9780199549276.001.0001>.
- 33 *The Dictionary of National Biography (DNB)*, s.v. 'Rowlands, Samuel (fl. 1598–1628)' by Reavley Gair.
- 34 Ibid.
- 35 For frontispieces see Samuel Rowlands, *The Knave of Clubbes* (London, 1609; STC: 21387), *Early English Books Online (EEBO)*; *Knave of Hartes* (London, 1613; STC: 21391), *EEBO*; *More Knaves Yet? The Knaves of Spades and Diamonds* (London, 1613; STC: 21392.3), *EEBO*. See also Nicholas Tosney, 'The Playing Card Trade in Early Modern England', *Historical Research* 84.226 (2011), 637–56, <https://doi.org/10.1111/j.1468-2281.2011.00573.x>.
- 36 David Bevington, *From Mankind to Marlowe: Growth of Structure in the Popular Drama of Tudor England* (Cambridge, MA, 1962), 3, <https://doi.org/10.4159/harvard.9780674734340>.