

CHAPTER I

*Foundations and legacies: the Reformation
 and the royal supremacies, 1530–1660*

In the records of parliament, the revolutionary is intermingled with the mundane. In 1533, parliament found time, between making a statute to pave the streets of London and passing an act to prevent ‘excess in apparel’, to redefine the relationship between the king and the church in England. The Act in Restraint of Appeals was not the first assertion of royal independence from clerical jurisdiction, for such claims had been made by medieval kings against popes. But 1533 marked something qualitatively new. It began a process of reconstituting the English church and crown which would fuel debate for the next 150 years.

This chapter surveys the institutional framework and arguments for the supremacy from 1530 to 1660, paying particular attention to statutes, texts, themes, and ambivalences which would become significant in the Restoration. The following is, therefore, not a full account of Tudor and early Stuart supremacy, for that would be a book in itself, and it may even distort the relative significance of certain events and writers because of its ultimate focus on Restoration uses of this tradition. Thus the 1559 Injunctions will be found to be as important as the Acts of Supremacy and the Edwardian Act for the Election of Bishops will be shown to have had a vibrant Restoration afterlife. The origins both of legal discourse about crown, parliament, and canon law and those of the idea of *iure divino* episcopacy will be outlined, to show how ideas which would later cause conflict over supremacy were not created with the intent of challenging royal power. Most important of all, there was no one Reformation interpretation of supremacy which could validate or invalidate a single Restoration view of it. If the dominant rhetoric (intended by Henry) was of monarchical jurisdiction over an episcopal church, the method of the 1530s revolution left crucial questions unanswered. A supremacy enforced by statute implied parliament had a role in church government. Henry’s theological idiosyncrasies and the reform and counter-reform undertaken by his successors created a hybrid and fudged reformation. What status

did it leave bishops? Could any religious group use supremacy or was it fundamentally Protestant? Differing versions of supremacy were not invariably present, but were always latent, between the 1530s and 1660. Nor were they necessarily conflicting: only particular events or aims caused monarchical and parliamentary, or royal and episcopal, authority to clash. Crucially, however, Restoration writers had to work within, and were able to exploit, a rich legacy of ecclesiological argument.

ESTABLISHMENT: 1530–1547

In the 1530s, statutes dismantled papal authority in England and transferred Rome's fiscal and juridical powers to the crown. Payment of annates, first fruits, and Peter's Pence was banned. Appeals to Rome were outlawed. The monasteries were dissolved and their revenues administered by the Court of Augmentations. Most famously of all, the Act in Restraint of Appeals of 1533 (24 Hen. VIII c. 12) outlined two complementary spiritual and temporal legal systems which both operated under royal jurisdiction.¹ Describing England as an empire, presided over by a king with 'plenarie hole and intiere power ... and jurisdiction to render and yelde Justice and final deternynacion ... in all causes', this outlined in the highest degree what would come to be known as sovereignty. It also asserted the jurisdictional self-sufficiency of the English church under the king (and indeed this act made the archbishop of Canterbury the judge of final appeal, changed in 1534 to the king or chancery). The Act of Appeals was the most famous statement of Henrician *imperium*, but other statutes would prove equally significant in the long run. The Act Restraining the Payment of Annates (25 Hen. VIII c. 20) set down that it was *praemunire* for an archbishop to refuse to consecrate the king's nominee to a bishopric, a law which would worry clergy opposed to James II's catholicising programme in the 1680s. This followed the Act of Submission of the Clergy (25 Hen. VIII c. 11), which ordered that convocation needed a royal writ to assemble, separate permission to debate new canons, and that draft canons became legally binding only with royal assent. Royal ratification ordained by statute opened a loophole for later claims that parliament could and should ratify canons. In 1682, the royal paper office contained some unspecified manuscripts about the Submission.² All these acts were

¹ G. R. Elton, 'The Evolution of a Reformation Statute', *English Historical Review*, 64 (1949), pp. 174–97.

² Bodl., Tanner MS 271, fo. 58v.

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repealed by Mary and revived by Elizabeth. Two others were repealed and not revived: the Act Extinguishing the Authority of the Bishop of Rome (28 Hen. VIII c. 10), which set out an oath to ‘utterly renounce’ papal jurisdiction and accept the royal supremacy; this was in effect replaced by the Elizabethan Oath of Supremacy, still in force in the Restoration. And the Act of Supremacy itself (26 Hen. VIII c. 1), not revived because Elizabeth changed her title, was a brief law notable mainly for how it ‘corroborates’ and ‘confirms’, i.e. did not create, supremacy.

What parliament legislated, Henry practised. The visual culture of English worship was supposed to change: mentions of the pope and Thomas Becket expunged; royal coats of arms painted in churches. The Great Bible of 1540 depicted Henry handing down the Word of (a rather tiny) God to his people. In 1538 he sat in judgement on the radical John Lambert. In 1536 he delegated his supremacy to Thomas Cromwell, his vicegerent in spirituals. This, perhaps intended to intimidate the bishops, would inspire later anticlerical authors such as William Prynne before the Civil Wars, and the Earl of Shaftesbury after them. And the royal injunctions of 1536, drafted by Cromwell, ordered that ‘supremacy be preached four times a year. If bemused priests wondered how to do this, they could find plenty of arguments for supremacy spewing from the press.³

Understandings of royal government of the church rested on how the church itself was conceived. The visible church on earth included both the saved (the invisible church) and the reprobate, the wheat and the tares (Matt. 13:29). As an earthly society, it was a corporation which needed hierarchy and government, but did it need universal government? The bishops’ formulary of faith of 1537 noted that the catholic church was geographically unbounded, a spiritual unity and mystical body headed by Christ. But this entity was composed of ‘particular churches’, which were ‘all equall in power and dignitie’, none ruling over the others. Rome was not of itself the catholic church but only a member of the same, along with the churches of England, France, and Spain. The revised formulary of faith authorised by the king in 1543 concurred. Both texts went on to explain how each particular church was governed by its own rulers. For

³ Henrician supremacy is more fully dissected in Graham David Nicholson, ‘The Nature and Function of Historical Argument in the Henrician Reformation’ (Ph.D thesis, University of Cambridge, 1977); John Guy, ‘Thomas Cromwell and the Intellectual Origins of the Henrician Revolution’, and ‘Tudor Monarchy and its Critiques’, in Guy, ed., *The Tudor Monarchy* (1997); Walter Ullmann, ‘“This Realm of England is an Empire”’, *Journal of Ecclesiastical History*, 30 (1979), pp. 175–203; Shelley Lockwood, ‘Marsilius of Padua and the Case for the Royal Ecclesiastical Supremacy’, *Transactions of the Royal Historical Society*, 6th ser., 1 (1991), pp. 89–119.

churches in diuers contreries seuerally called ... for theyr most necessary gouernement, as they be distinct in places, so they haue distinct ministers & diuers heades in earth, gouernours, and rulers.⁴

Such claims justified jurisdictional independence from Rome, but did not of themselves argue for royal as opposed to archiepiscopal supremacy. They did, however, mark a shift not only away from papal authority but also from the ecclesiastical supremacy of a general council. As Reformation divisions became entrenched, papalism was refuted not by conciliarism but provincial self-determination – or, perhaps more accurately, by the version of conciliarism that had emphasised national over general councils.

The King's Book did explain that Christian kings 'be the head gouernours vnder [Christ], in the particular churches'.⁵ But it was the theologically conservative bishop of Winchester, Stephen Gardiner, who offered the fullest case for *royal* supremacy over these provincial-cum-national churches. In 1532 Gardiner had seemed to be a staunch defender of the church against the supremacy, penning the 'Answer of the Ordinaries' which insisted on the clerical, rather than royal, right to rectify religious grievances. But in 1535 Gardiner appears to have experienced a change of heart, an alteration of view which his tract began by characterising as a Damascene conversion. (The Protestant annotator of the edition republished to embarrass Gardiner under Mary I dubbed him 'Doctor dubbleface'.)⁶ Gardiner too argued that Christ headed the universal church, but added that as a 'communion of christen people' a group of people were named a 'church', and 'to be named the church of Englande as is the church of Fraunce the church of Spayne *and* the church of Rome'. The king, as head of the body politic, must logically head the Church of England, based on a nominalist claim that church and commonwealth were two names for the same thing:

seing the church of Englande consisteth of the same sortes of people at this daye that are comprised in this worde realme of whom the kinge his [*sic*] called the headde: shall he not beinge called the headde of the realme of Englande be also the headde of the same men when they are named the church of Englande?

⁴ *The Institvition of a Christen Man* (1537, citing STC 5164), fos. 14v–15v; *A Necessary Doctrine and Erudition for any Christen Man* (1543, citing STC 5168), fos. 15v–17v.

⁵ *Necessary Doctrine*, fo. 17v.

⁶ Stephen Gardiner, *De vera obedientia oratio*, in Pierre Janelle, ed., *Obedience in Church and State: Three Political Tracts by Stephen Gardiner* (Cambridge, 1930), pp. 70–3, 169 (marg.). See Glyn Redworth, *In Defence of the Church Catholic* (Oxford, 1990), p. 66, n. 59, for a defence (*contra* Janelle) of Gardiner's sincerity.

This bishop found it impossible to conceive of the king as head of his subjects but not supreme head over the church of English Christians.⁷ Throughout the early modern period, defenders of supremacy would continue this dual argument, firstly showing the independence of provincial churches and secondly proposing royal headship over the same as logically following. Crucially, however, the two prongs could be separated to argue for episcopal government of the church on the model of pre-Constantinian Christianity. But the assumption that all the members of the polity were (or ought to be) of one religion reinforced and underlay the logic of royal civil and ecclesiastical headship. This assumption was the bedrock of the Restoration Anglican drive for uniformity.

Defending royal jurisdiction over ecclesiastical affairs was facilitated by the idea that the details of worship practised by the members of the English church-state were not specified by divine law. The catholic universal church shared doctrine, but worship differed over space and time, because significations of decency and reverence varied in different societies. Rites and ceremonies were thus unspecified in the Bible, but governed by the need to worship ‘decently and in order’ (I Cor. 14:40), interpreted to require uniformity in a single state. It was such *adiaphora* which kings decreed, explained Thomas Starkey’s *Exhortation to the People*, written in 1535 and published the following year. This outlined how ‘all suche thynge, whiche by goddis worde are nother prohibyted nor commaunded’ were ‘lefte to worldly polycie, wherof they take their ful authoritie’.⁸ For Starkey it was the king whose ‘worldly policy’ determined *adiaphora*, those items in which the *Institution* thought provincial churches to ‘moche differe, and be discrepant the one from the other’. This theory was particularly advantageous for the supremacy, since it outlawed papal impositions of universal standards, and yet barred challenges from dissent within the realm: it was ‘conuenient’ for each province to have a head, but ‘playne foly’ to think that a single head could govern diverse nations, languages, and laws.⁹ Henry’s polemicists here described what their king practised in his Injunctions of 1536. That monarchs decided ceremonial details but did not interfere with doctrine would become another classic defence of supremacy. Restoration clergy attacked Dissenters for refusal to obey national decisions on *adiaphora*.¹⁰

The pre-modern distaste for anything innovatory was potentially problematic for defending the supremacy. Writers thus manipulated history

⁷ Gardiner, *De vera obedientia*, pp. 115, 93–5 (qu.).

⁸ Thomas Starkey, *An Exhortation to the People* (1536), fo. 6v.

⁹ *Institution*, fo. 15r; Starkey, *Exhortation*, fos. 66v–67r. ¹⁰ See Chapter 3, p. 146.

to assert papal power was a novelty which usurped royal and episcopal rights. Supremacy theorists struck at the root of papal claims when they insisted that all the apostles had held equal authority. Simon Matthew preached that ‘the substance of the church was equally builded vpon them all’. Reflecting this state of apostolic equality, bishops in the early church were also noted to have held ‘lyke meryte ... lyke prelacy’, each supreme in their own diocese, free from earthly headship or Roman interference.¹¹ Henry’s polemicists denied the antiquity of papal claims, pointing to Nicene canons which spoke of the ancient custom of episcopal equality, and to evidence that the pope had interpolated canons advantageous to himself. A hundred and fifty years later, the great Restoration antipapal polemicist Isaac Barrow would repeat these ideas.¹² Renaming the pontiff the bishop of Rome thus bore ideological weight, for it implied that his jurisdiction (or lack thereof) over England was the same as any other foreign bishop’s.¹³

The origins of papal power were thus deemed *iure humano*. A common history was constructed of clerical jurisdiction being a legacy of innocent gifts made by emperors to early pious clergy, or powers which cunning papal ambition had extorted from naïve rulers, later falsely claimed as *iure divino*.¹⁴ Henry’s *Epistle* to Christian princes, rejecting participation in the Council of Trent, castigated the pope’s ‘pretended honour fyrste gotten by superstition, after encreased by violence ... borne by the ignorancie of the worlde, nourished by the ambition of byshops of Rome, defended by places of Scripture, falsely understande[d]’.¹⁵ The royal almoner Edward Foxe blamed the seventh-century Byzantine emperor Phocas for ceding imperial powers.¹⁶ Foxe’s narrative is worth quoting at length since it would be echoed and subverted in the seventeenth century:

¹¹ Simon Matthew, *A Sermon made in the Cathedrall Church of Saynt Paule at London, the XXVII day of June, Anno 1535* (1535), sig. c4r–v; *Institution*, fo. 48r; *Necessary Doctrine*, fos. 37v–38r; Edward Foxe, *The True Dyfferens Between the Regall Power and the Ecclesiasticall Power*, trans. Henry Lord Stafford (1548), fos. 21v, 31v, 15r; Cuthbert Tunstall, *A Sermon of Cuthbert Byshop of Duresme made vpon Palme Sondaye last past* (1539), sig. [c6]; Thomas Swinnerton, *A Mustre of Scismatyke Byshoppes of Rome* (1534), sigs. [c6]v–[c7]r; [Thomas Swinnerton], *A Litel Treatise Ageynste the Mutterynge of some Papistis in Corners* (1534), sig. A3r.

¹² Tunstall, *Sermon*, sigs. D5v–[D6]v; *Institution*, fos. 47v–48r; *Necessary Doctrine*, fos. 38v–39r. For Barrow, see below, Chapter 6, pp. 244–51.

¹³ Gardiner, *De vera obedientia*, pp. 127–9; Matthew, *Sermon*, sig. B2v; Swinnerton, *Mustre*, sigs. [c4]v, D3r.

¹⁴ Starkey, *Exhortation*, fos. 61v–62r.

¹⁵ *An Epistle of the Most Myghty & Redouted Prince Henry the VIII ... to all Christen Princes* (1538), sig. A4r–v.

¹⁶ Anon., *A Treatise Provyng ... the Bishops of Rome had Neuer Ryght to any Supremitie within this Realme* (1534), sig. [A4]r; Foxe, *True Differens*, fo. 30r; Gardiner, *De vera obedientia*, p. 149.

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grette was the police and subteltye of the byshoppes of rome for whome [bishops] dyd fyste go aboute to abtayne *the* chefe Empyre and supremacye, thei dyd deuyde the power and iurisdiction with kinges with verye louinge and gentle termes or titles, and so that they might be made lordes in spirituall thinges they dyd permyt to kinges all temporall thinges ... And the swerde (whiche they haue sharpened by the the gentilnes and permission of prynces & endowed with worldly riches and possessions by the gentle and lyberall gifte of princes) they exercice & drawe it out agaynst them when they thinke best.¹⁷

A good mark of a writer's religious attitude would be whether they applied such a narrative to popes, papal clergy, English bishops, or all churchmen. Dissenters might argue that all prelates played such tricks; anticlerical writers that it was a fault of any cleric – priestcraft *avant la lettre*. The *iure humano* origins of papal or episcopal authority were important to demonstrate because emperors and kings could reverse their ancestors' grants.

Complementing the idea of papal novelty in the 1530s was an insistence on the ancient nature of the royal supremacy, evident in sacred Israelite history, imperial Christian Rome, and defended despite papal incursions during the medieval era. These examples would prove axiomatic for decades, especially those from the Bible and the fourth-century church. (Early modern authors would differ as to whether they emphasised medieval papal hegemony or royal defiance of it.) Henry's polemicists insisted that the royal supremacy was, contrary to appearances, not a new invention, though perhaps a newly clear title. His ancestors, it was asserted, had 'the self same power and supremitie' which was 'vnited and knytte to the imperiall crowne ... though they dydde not vse to wryte the same in their style'.¹⁸ David, Solomon, Hezekiah, and Jehosaphat had appointed priests and Levites, deposed the same, purged God's people of idolatry, and purified the Temple. 'The byshoppes of the Hebrewes' – the anachronism is telling – 'were subiectes to kynges, and the kynges deposed the bysshoppes'.¹⁹ Such histories were embodied in the *Collectanea satis copiosa*, the 'sufficiently copious' documentary dossier assembled in the early 1530s on the historical practice of royal supremacy.

The two key eras which bore witness to royal *imperium* – Israelite and Constantinian – also provided a store of examples of the limits as well as powers of supremacy. If royal ecclesiastical authority undoubtedly

¹⁷ Foxe, *True Differens*, fos. 41r–42r. See below, p. 280.

¹⁸ *Treatise Provyng ... the Byshops of Rome had Neuer Ryght to any Supremitie*, sig. A3r; Gardiner, *De vera obedientia*, pp. 91–3, 121.

¹⁹ Gardiner, *De vera obedientia*, pp. 107–13; Anon., *A Dialogue Betwene a Knyght and a Clerke* (1533), fos. 6r (qu.), 13r; Foxe, *True Differens*, fos. 59v–67v (from fo. 64 the facing rectos and versos share a folio number).

included expelling papal jurisdiction, it was not deemed unbounded. This, not surprisingly, was made clear by Henry's more conservative supporters. Gardiner said the king was supreme 'albeit not in all thinges yet in most thinges' and Tunstall's letter to Pole insisted that supremacy did not involve the king preaching.²⁰ The evangelically minded Foxe was more ambiguous. When describing the ecclesiastical supremacy of Anglo-Saxon princes, Foxe pointed to their laws for 'the ordering & reseruing of Sacramentes & spirituall thinges', for such monarchs 'had grete autorite *in* spiritual thinges'. Foxe never suggested that kings could actually administer the sacrament, and he, unlike the translator of his work, Lord Stafford, described them as investing not consecrating bishops, even when forbidden by popes. As Francis Oakley has shown, Stafford consistently mistranslated this as consecration (although a careful reading of even the translation hints that investiture is what is meant).²¹ The Bishops' Book of 1537 more clearly adhered to a limited supremacy, saying:

we maye not thinke, that it doth apperteyne vnto thoffice of kynges and princis, to preache and teache, to administre the sacramentes, to absoyle, to excommunicate, and suche other thynges, belongyng to thoffice and admynistration of byshops and priestes.

The status of kings as 'chiefe heedes and ouerlokers' was to ensure that priests were carrying out their functions, and enforce their duties on them if they disobeyed.²² The statement was pithy, clear, and unambiguous. It also disappeared from the revised version of 1543, a rare instance where the King's Book looked less traditional than the Bishops' Book. That supremacy was jurisdictional, not priestly, was the most important defence of it throughout the early modern period.

The two formularies did concur, however, in characterising the supremacy as empowering the monarch primarily so that he could carry out certain duties. Supremacy was limited by the moral duty to defend true religion more than by earthly constitutionalist constraints. The royal duty to uphold religious truth was a common line amongst men who would doubtless have fundamentally disagreed as to what true religion was. The humanist Richard Morison argued that it was 'a princis dede' to expel the

²⁰ Gardiner, *De vera obedientia*, p. 119; Cuthbert Tunstall and John Stokesley, *A Letter written ... vnto Reginald Pole* (1540), sig. c4r.

²¹ Foxe, *True Differens*, fos. 80r, 83r, 85v–r [*sic*]. The translation's hint is where it speaks of consecration by 'a ryng and a crowche'. See Francis Oakley, 'Edward Foxe, Matthew Paris, and the Royal *Potestas Ordinis*', *Sixteenth Century Journal*, 18 (1987), pp. 347–53.

²² *Institution*, fo. 49v.

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pope, and commendable to restore true religion; the conservative Bishop Tunstall that to enforce the doing of their duties on the clergy was what ‘the chiefe and the best of the kynges of Israell did, and as all goode christiane kynges *oughte* to doe’.²³ One tract of 1534 argued that kings and parliaments not only had power to redress defaults, but were bound in conscience so to do.²⁴ This type of rhetoric powerfully authorised the king to make sweeping changes under the guise of reforming abuses, and the ambiguity of ‘true religion’ allowed support to be drawn from groups otherwise opposed. Yet it also opened up the supremacy to pressure from a variety of quarters – inevitably someone was going to be disillusioned with royal policies – and would, in the reigns of Henry’s successors, permit ‘counseling’ the monarch as to what true religion was to slide into a contest as to who could manipulate the supremacy into upholding their own aims.

The majority of those who wrote on supremacy in the 1530s were clergy, but one of the lay minority is crucial to consider: the Middle Temple utter-barrister Christopher St German. Fairly conservative in his theology and piety, St German came to the supremacy after a career in common law practice, which had been under attack from the equitable jurisdiction of Chancery as well as perennial clashes with ecclesiastical courts.²⁵ From his most famous work on English laws, *Doctor and Student*, in use until the 1870s, to his printed tracts on lay–clerical relationships (some against Thomas More), to his unprinted discussions on the sacraments and soteriological fundamentals, St German attacked clerical meddling with anything construed as property. Mortmain, sanctuary, benefit of clergy, mortuaries, and diriges were all to be regulated by the laity, not the clergy. For churchmen to claim tithes *iure divino* was an error. Justices of the peace ought to be able to enquire into, though not judge, heresy.²⁶ Prelates wrongly made laws independently of parliament, so many extant canons clashed with English laws and the royal prerogative. St German’s visceral anticlericalism led him to propose penalties of treble damages on clergy who failed to use the king’s laws when handling property, and

²³ Richard Morison, *A Lamentation ... what Ruynes and Destruction cometh of Seditious Rebellon* (1536), sig. B2v; Tunstall, *Letter*, sigs. D4v–D5r (my emphasis).

²⁴ *Treatise Provyng ... the Byshops of Rome had Neuer Ryght to any Supremitie*, sig. Dr.

²⁵ On the context, see Alan Cromartie, *The Constitutionalist Revolution* (Cambridge, 2006), ch. 2; J. H. Baker, ed., *The Reports of Sir John Spelman* (2 vols., 1977–8), vol. 11; Christopher W. Brooks, *Law, Politics and Society in Early Modern England* (Cambridge, 2008), chs. 2–3.

²⁶ Christopher St German, *Doctor and Student*, ed. T. F. T. Plucknett and J. L. Barton (1974), pp. 320–3; Christopher St German, *A Treatise Concernynge the Diuision Between the Spiryтуalitie and Temporalitie*, in Thomas More, *Complete Works*, vol. 1v, ed. J. B. Trapp (New Haven, 1979), pp. 175–212, at pp. 190, 195; Christopher St German, *The Addicions of Salem and Byzance* (1534), fo. 14r.

tenfold requital if they charged fees for visitations.²⁷ Historians have generally agreed that St German located supremacy not in the king alone, but in king-in-parliament, most clearly in *An Answer to a Letter* (1535).²⁸ The following account confirms that St German had a rather different concept of *imperium* to his monarch. But despite the underlying continuities across his works, looking in detail at his illustrative examples demonstrates that he spoke interchangeably and loosely of king, parliament, and king and parliament. St German would thus bequeath both the idea that parliament had a role in the supremacy and frustrating imprecision in expressing this.²⁹

Whilst limiting the sphere of clerical jurisdiction by removing from it anything which might be deemed property, St German attacked the distinction between laity and clergy. Almost every one of his tracts insists that the ‘church’ includes all Christian people, not just the clergy. ‘Al the people of Englande make the churche of Englande’, he wrote in 1534, echoing the arguments for royal supremacy discussed above.³⁰ Such language would be developed by later critics to undermine clerical privileges and powers, such as that of excommunication. If contemporary definitional laxity wrongly employed church for churchmen, it erred even more badly by treating the see of Rome and the church as synonymous.³¹ This was not the only aspect of St German’s thought which cohered with wider Henrician argument. He offered his own story of the rise of clerical power through pious princes granting early churchmen powers ‘which they might haue done themselfe if they hadde lyste’. The long practice of such activities had led to the mistaken idea that they were held by the clergy *iure divino* – and thus to the decay of royal authority. The emperor Phocas, St German tartly pointed out, would never have granted popes

²⁷ Christopher St German, *A Treatise Concernynge Diuers of the Constitucyons Prouiynciall and Legantines* (1535), sig. [A5]v; Christopher St German, *A Treatyse Concerninge the Power of the Clergye and the Lawes of the Realme* (n.d.), sig. c2r; St German’s parliamentary draft of 1531 in John Guy, *Christopher St German on Chancery and Statute* (1985), pp. 130, 132.

²⁸ John Guy, ‘Thomas More and Christopher St German: The Battle of the Books’, in Alistair Fox and John Guy, eds., *Reassessing the Henrician Age* (Oxford, 1986); Guy, *Chancery and Statute*, pp. 39–40. Cromartie dissents, but on his account, see below.

²⁹ Bequeath in a loose sense: it is exceedingly difficult to trace the direct legacy of anything beyond *Doctor and Student*. Nevertheless, later writers clearly participated in the same sentiments.

³⁰ St German, *Addicions of Salem and Byzance*, fo. 49v (qu.); St German, *Power of the Clergye*, sig. d4r; St German, *Constitucyons*, sig. [A8]v; Christopher St German, *An Answer to a Letter* (1535), sig. B2v; Christopher St German, *A Treatise Concernynge Generall Councilles, the Bysshopes of Rome, and the Clergy* (1538), sig. c5v. On the authorship of the last, see Richard Rex, ‘New Additions on Christopher St German: Law, Politics, and Propaganda in the 1530s’, *Journal of Ecclesiastical History*, 59 (2008), pp. 281–300.

³¹ St German, *Addicions of Salem and Byzance*, fo. 24v.