

Mercer Quarterly Court

L. C. Chambers

Plaintiff

-v- Petition of J.W.Davenport to be made party defendant and his answer, counter-claim and cross-petition

Dillard Brown

Defendant

Comes J. W. Davenport and petitions the Court to make him a party defendant, and to treat this petition as his answer, counter-claim against the plaintiff and as a cross-petition against the defendant Dillard Brown, and for cause says;

That he has a mortgage for \$1500 recorded acknowledged and executed in the Mercer County Court Clerk's Office which mortgage covers and includes the batteries sued for herein and that the debt is past due and unpaid; that having a lien on said batteries he is legally entitled to and has a lien on the fund adjudged to the plaintiff herein and is entitled to the benefit of said recovery.

Wherefore he prays that the Court make him a defendant treat this pleading as his answer and crosspetition and that it adjudge that the recovery goes to this plaintiff as mortgagee and for credit on the indebtedness of the plaintiff to him. He prays for all proper relief.

Chambers

Atty for J.W.Davenport

The affiant J. W. Davenport, states that the statements of the foregoing pleading are true.

J.W.Davenport

Subscribed and sworn to before me by J. W. Davenport March 7, 1922

W.W. Phillips  
Exr M.C.C.C.