

T. A. Huser
MERCER CIRCUIT COURT

T.A.HUSER

PLAINTIFF

VS** PETITION

MRS. EFFIE SHIRLEY

DEFENDANT

Plaintiff, T.A.Huser, states that he is now and was at all times herein mentioned, engaged in the grocery business in Harrodsburg, Kentucky, and that at the special instance and request of the defendant, Mrs. Effie Shirley, between the dates of 1926 and March 3, 1927, he sold and delivered to defendant goods, wares and merchandise in the aggregate amount of \$140.28.

Plaintiff states that the said goods and merchandise were reasonably worth the sums charged therefor, and that defendant agreed and promised to pay the same, in all the said sum of \$140.28. Plaintiff states that between the dates of October 9, 1926, and October 30, 1927, defendant made various payments on said account, amounting in the aggregate to the sum of \$85.45, leaving a balance due on said account as of October 30, 1927, of \$54.83. Plaintiff states that, although frequently demanded, no part of said balance has been paid and that said sum of \$54.83 became due on October 30, 1927.

Plaintiff files herewith, as a part hereof, a statement of said account showing the charges and credits thereon, marked Exhibit "A". Plaintiff says that the said statement of the account contains all of the items purchased except a balance due of \$16.50 as of October 4, 1926, he says that the said statement of the account as to the said balance of \$16.50 is lost, but that said balance is true and was ratified by the said defendant.