

MERCER CIRCUIT COURT

ROBENER ESTELL

PLFF

-vs-

PETITION

GEORGE ROACH

DEFT

The Plaintiff, Robener Estill, states that she and the Defendant, George Roach, were formerly husband and wife, and that by a judgment of this Honorable Court, she and the Defendant were divorced. She says that previous to their marriage, to wit, the _____ day of 1912, at the special instance and request of the Defendant, she lent him the sum of \$763.00 which he agreed and promised to pay her on demand, with interest thereon at the rate of 5% per annum; that on March _____ 1917, he paid her on said indebtedness the sum of \$500., but except said sum no part of same has ever been paid. She says that she was divorced from the Defendant at the January term 1919 of this Honorable Court. She says that previous to her divorce and separation from the ~~Rx~~ Defendant, at his special instance and request she worked for him in his tobacco crop at such times as she was not engaged in her domestic duties and that he agreed and promised to pay her therefor the sum of 50 cts per day, and that she was engaged in said labor under said agreement 40 days each for seven years previous to her divorce, and for which indebted the Defendant is ~~indebted~~ to her in the sum of \$140. She says that previous to her divorce from the Defendant, but after her separation from him and in contemplation of a divorce she and the Defendant made and entered into an agreement for the division of property then held jointly by them; that the property that she received in said division to the amount of \$200. in value was left by her with the