

MERCER QUARTERLY COURT.

W. A. TAYLOR

PLFF.

VS.

PETITION IN EQUITY

CHRIS WATTS

DEFT.

The plaintiff, W. A. Taylor, states that the defendant, Chris Watts, is indebted to him in the sum of \$155.82 for goods and merchandize furnished to him by this plaintiff, at his special instance and request, and for which he agreed and promised to pay to him the various sums set out in above account, which is filed herewith, as part hereof and marked "A" for identity.

He states that said goods were sold and delivered to the defendant, for which he agreed to pay the total sum of \$155.82. He states that no part of said account has been paid, although the same is long since past due. He states that under the claim above set out that it is just due and owing that he ought to recover of said defendant the above sum and interest from this date and cost of this action. He states that this is a suit upon a contract made by the defendant with the plaintiff to pay money; that defendant has no property in this State subject to execution and not enough thereof to satisfy demand and the collection of the demand will be endangered by delay in obtaining judgment and return of no property found; that this is action for the recovery of money and that the defendant is about to sell, convey and dispose of his property with a fraudulent intent, to cheat, hinder and delay his creditors and this plaintiff.

Wherefore the plaintiff prays for a judgment against the defendant in the sum of \$155.82 with interest from this date