

Mercer Quarterly Court

Hettie B. Hanna, Plaintiff.

vs. Petition in Equity

Zay Bond & J.B. Thompson, Defendants.

The Plaintiff, Hettie B. Hanna, states that F.G. Hanna departed this life, a resident of Mercer County, on the day of Dec., 1916, leaving a will, whereby he devised all of his estate, of every kind, to the Plaintiff. She says that said will was duly probated in the Mercer County Court and is a matter of record in that office. She says that the Defendant Zay Bond is indebted to said estate in the sum of \$66.60 for goods and merchandise sold and delivered to Defendant, at his special instance and request, by F.G. Hanna in his lifetime, for which he promised and agreed to pay the prices charged in an account filed herewith marked "A", no part of which has been paid. Plaintiff says that by reason of will of the said F.G. Hanna she is the holder and owner of the said debt.

arises by contract and

She states that her claim against the Defendant is as stated above; that it is just, and she believes she ought to recover of the Defendant Zay Bond the sum of \$66.60 and her cost herein expended. She says that the Defendant has no property in this state subject to execution, or not enough thereof to satisfy Plaintiff's claim, and the collection of her demand will be endangered by delay in obtaining judgment or a return of no property found. She states that Defendant Zay Bond is in the employ of Defendant J.B. Thompson and that the said Thompson is indebted to him in the sum of money, and Plaintiff asks that the said Thompson's manager and agent in Hagerstown be summoned as garnishee herein.

Hettie B. Hanna states that she is the Plaintiff in this action and that she believes the statements of the foregoing petition are true. *Hettie B. Hanna*

Subscribed and sworn to before me by Hettie B. Hanna this April 28, 1917.

John J. Vanecky, Esq.
Notary Public, for Mercer County
W. J.