

Odell Higgins, suing by his next friend
Margaret Higgins,

Plaintiff

VS Statement

Will Higgins, *Richard*

Defendant

Plaintiff, Odell Higgins, suing by his next friend Margaret Higgins, states that the defendant, Will Higgins, ~~Richard~~ is indebted to him in the sum of \$9.00, said amount being value of services rendered to defendant at his special instance and request.

Plaintiff says that this is an action upon a contract being a contract to pay money for services rendered; that said account is just; that defendant has no property in this state subject to execution or not enough thereof to satisfy and pay said indebtedness and the collection of the demand will be endangered by delay in obtain judgment and return of no property found. Plaintiff says that he has no guardian, curator or committee appointed for him in this state; that Margaret Higgins, his mother, is his next friend; that she is a resident of this state and is under no disability,

Wherefore, plaintiff prays for judgment against defendant in the sum of \$9.00; for costs of this action and for a general order of attachment of defendant's property and for all other relief to which he may appear to be entitled.

Ernest W. Draper
Attorney for Plaintiff

Affiant, Margaret Higgins, states that the statements of the foregoing petition are true.

Margaret Higgins

Subscribed and sworn to before me by Margaret Higgins this the 10th., day of July 1925.

Ben O. Allen
Judge