

Mercer Quarterly Court

Adams Brothers

Plaintiff

vs-- petition

Goley Smith

Defendant,

Plaintiff, Adams Brothers states that they are a partnership composed of John Adams and DeWitt Adams doing a general grocery and Hardware business in the town of Harrodsburg, Kentucky and that at the special instance and request of Defendant, Goley Smith, between the dates of 12/12/25 and 7/31/26 they sold and delivered to defendant goods, wares and merchandise in the aggregate sum of \$56.85

Plaintiff says that the said goods and merchandise were reasonably worth the sums charged therefor, and that the defendant agreed and promised to pay the same, in all the said sum of 456.85  
Plaintiff states that between the dates of ~~xxxx~~ 1/4/26 and January 1, 1927 made a \$20.00 payments on the said account in the sum of \$20.00 as shown by the itemized bill filed herewith. Leaving a balance due as of January 1, 1927 ~~1926~~ of \$36.85. Plaintiff states that, although frequently demanded, no part of the said balance has been paid and that said sum of ~~xxxxxx~~ \$36.85 ~~\$46.85~~ became due January 1, ~~1926~~ 1927.

Plaintiff files herewith an itemized statement of the said account marked Exhibit "A".

Plaintiff says that the said account is just due and unpaid, that he ought, as he verily believes recover thereon the sum of \$46.85; that the defendant has no property, or not enough thereof, subject to execution to pay the said amount and defendant's other creditors; that his claim will be endangered by delay in obtaining judgment and return of no property found;