

MERCER QUARTERLY COURT

RALPH E. YOUNMAN

PLAINTIFF

VS

PETITION

SAM CARR

DEFENDANT

Plaintiff, Ralph E. Youman states that defendant, Sam Carr is indebted to him in the sum of \$81.50, for professional services rendered to said Sam Carr at his special instance and request. Itemized statement of account is filed herewith as part hereof. Plaintiff says that said account is past due and that it is not subject to any credits or discount, and though demand has been made upon defendant for payment of same, he has failed and refused to pay said account or any part of same.

Plaintiff says that this is an action against a contract, being a contract to pay money for services rendered; that said account is just; that he believes he ought to recover the full amount of the account, to wit, \$81.50; that defendant has no property in this state subject to execution and that collection of the demand will be endangered by delay in obtaining judgment and a return of no property found.

WHEREFORE, plaintiff prays judgment against defendant for the sum of \$81.50, for cost of this action and for a general order of attachment of defendant's property, or so much thereof as will satisfy and pay said indebtedness, and plaintiff prays further for all relief to which he may be entitled.

Errol W. Draffer