

Mercer Quarterly Court

Plaintiff

Harrodsburg Implement Co

-v- Petition in Equity

J. H. Varnsdall and Lottie Varnsdall

Defendants.

The Plaintiff states that it is a corporation under the Kentucky laws with power to sue and be sued and to contract and be contracted with;

that Dec. 11, 1920 it sold to J. H. Varnsdall 1 32 x 4 Goodrich tire for \$29.30, and on Dec. 21, 1920, 1 32 x 4 tire same brand \$29.30, 1 32 x 4 tube \$4.45, 14 gallons gas \$4.13  $\frac{1}{2}$  gal oil 50c and on March 14, 1921 2  $\frac{3}{4}$  rubber gaskets \$2.12, for all of which he agreed to pay it said sums and although past due no part thereof has ever been paid, the total due it being \$69.80.

It states that said articles were all bought for and were actually used in, on about and in operating one Hup Mobile touring car Motor #15593; that said car as it ~~xxxxxx~~ was informed and believed at the time is the property of J. H. Varnsdall, but it is now informed that the defendant Lottie Varnsdall claims to own it; and it says that if the car is the property of Lottie Varnsdall then that J. H. Varnsdall was acting as her agent and for her which the plaintiff did not then know, hence she ~~xxx~~ and said car as well are responsible for the amount of said articles.

It says that on July 2, 1921 it made affidavit to said account, showing the full amount thereof, the amount of all credits and offsets and filed the same in the Mercer County Court Clerk's Office where it is now of record thereby asserting a lien for \$69.80 and \$1.25 costs of filing and releasing said lien; that both defendants reside in Mercer County Ky.