

Mercer Quarterly Court

Plaintiffs

Will Denny and J. W. Denny
partners doing business as
Will Denny & Co

-v-
Petition

W. H. Motley, known also
as Will Motley

Defendants

The Plaintiffs, J. W. Denny and ~~Will Denny~~ Will Denny state that

they are partners doing business as Will Denny & Co; that on Octo 21, 1911

the defendant W. H. Motley who is also known as Will Motley executed and de-

livered to them his promissory note which is filed herewith as a part hereof

by the terms of which he agreed to pay them one day thereafter the sum of

\$153.18 with interest from maturity until paid; that said note is long

past due and no part thereof has been paid except the sum of \$28.86 paid

April 1, 1912.

They state that this is an action to recover the amount due on

said note and contract; that the amount thereof is just due and owing; that

they believe they should recover the full sum of said note and interest less

said credit; that ~~xxxx~~ the defendant has not sufficient property in this

State subject to execution to pay the amount of said note and the collection

thereof will be endangered by delay in obtaining judgment and return of no

property found.

Wherefore they pray judgment for \$153.18 with 6% interest from

Octo 22, 1911 subject to a credit of \$28.86 paid April 1, 1912, for their

costs and for a general order of attachment against the defendant with The L.

E. Myers Co as garnishee; they pray generally for all proper relief.

Wm Denny
atty