

M. Divine's Adm'r-

Plff-

Vs-

Brack Collier, Etc-

Dft's-

Comes now the plaintiff, M. Divine's Adm'r-,

answer

and for ~~with~~ to the Intervener's petition to be made a party and de-

admits that there has been attached in this action the machine described

in Intervener's petition as the property of Brack Collier- Plaintiff

Further alleges that said car is the property of said Brack Collier,

defendant herein; and denies that the said car was paid for by the said

Intervener- Plaintiff says that said car was purchased by the said Brack

Indsey

Collier, defendant herein, from ~~Brack~~ Brown as shown by the records of the

office of the Mercer County Court on the 16th day of January 1924, at

least this is the date of the transfer of said car to the said Collier,

but plaintiff has information and believes that said car was purchased

several weeks before that time and the transfer from some cause or oth-

er delayed until said date- He says that the exact date of said pur-

chase of said car as shown by the records of a suit filed in the Mercer

Circuit Court to recover on a note for \$350.00 and to enforce a mortgage

lien on said car given at the date of the purchase of the car to secure

the payment of said note was October 30th, 1923; that suit to subject

this car was filed against the said Collier and said suit satisfied and

paid off and dismissed by the said Collier paying the said amount to

said Brown. Plaintiff further says that on the ---- April 1924 the said

Brack Collier took out license on said car in the office of the clerk of

the Mercer County Court ~~in his own name and paid the fee therefore and~~

that then and subsequently on the same day fraudulently transferred to

the Intervening petitioner herein the license on said machine and that

said transfer of said machine as aforesaid was and is a fraud on the

rights of this plaintiff as his debt had at said time been in existence

about 10 years and that said transfer was not made in accordance with

the Statutes of Ky- which requires all transfers and assignments of per-

sonal property from a husband to his wife to be made in writing and ac-