

Mercer Quarterly Court

Farmers Bank of Salvisa, By &c

Plaintiffs

-v- Amended Petition

A. L. Burrus
J. M. Burrus
Burley ~~Growers~~ TOBacco Growers
Cooperative Association

Defendants

The Plaintiff comes and for amended petition says that
on Nov. 7, 1922, or about that time the defendant A. L. Burrus ^{while insolvent} by mort-
gage of that date conveyed and transferred to the defendant J. M. Bur-
rus his 1922 crop of tobacco which was pooled with the defendant associ-
ation and also transferred to him a bunch of sheep, a cream separator and
other personalty; that said transfer and mortgage was given for the
purpose of securing the payment of a pre-existing debt and with the in-
tent and purpose to prefer J.M.Burrus as a creditor over and above other
creditors of said A. L. Burrus; that by so doing in legal meaning the
defendant has assigned all his property for the benefit of creditors and
the plaintiff so insists and charges.

Wherefore the plaintiff makes J. M. Burrus a party defendant;
also makes said Association a defendant
asks for process against ~~them~~ herein; that the property be administered
as an assigned estate and the proceeds thereof held by the Association
until this case is decided then paid into the Court for division equitable
among the creditors of said A. L. Burrus. It prays generally for costs
and for all proper relief.

C. Hankin
Atty for the Plaintiff