

Mercer Quarterly Court

Hugh Caruthers

Plaintiff

Petition of Phil Royalty to be made party defendant and his answer counter-claim and cross-petition

B. M. Britton

Defendant

Comes Phil Roylay and petitions the Court to make him a defendant herein and to take this pleading as his answer, counter-claim against plaintiff and crosspetition against B.M.Britton and for cause says

That on Octo 4, 1921 there was issued to Royalty and Britton a contract of insurance covering a crop of tobacco raised by Britton on this petitioner's land in which this petitioner was the landlord; that it was destroyed by fire; that the proceeds thereof is the fund attached herein and in dispute; that prior to the date of said fire he had as such landlord furnished to the tenant necessary money with which to pay hands laboring therein the sum of \$82.50 no part of which had been paid to him and that to that extent he had and has a lien on the half of Britton under said policy.

Wherefore he prays that he be adjudged a lien on the interest of Britton under said policy to the extent of \$82.50 costs and all proper relief.

*Caruthers*  
Atty for Phil Royalty