

M.C. Helm and  
M.T. Helm, Partners trading  
and doing business under the firm  
name and style of  
M.C. Helm & Son.,

vs, ) Petition, The Early Tobacco Co. corporate name  
W.M. Gibson, ) self transfer to the same entity entered into a  
Mrs. W.M. Gibson and ) contract with a  
Citizen's Bank of Burgin, Ky, ) Defendants.

The Plaintiffs M.C. Helm and M.T. Helm, state that they  
are now and were at the times hereinafter stated, partners, engaged  
in merchandising, under the firm name and style of M.C. Helm & Son  
located and doing business in the city of Danville, Ky.

Plaintiffs say that the defts, W.M. Gibson and Mrs W.M.  
Gibson, are husband and wife, residing and engaged in Farming in  
Mercer County, Ky/

That the defendant Citizen's Bank of Burgin, is a coporate  
created and organized under the banking laws of the Commonwealth  
of Kentucky, and under its charter are now and were at the times here-  
inafter mentioned, doing a General Banking business in the Town of  
Burgin, Ky.

Plaintiffs say that on the first day of Jan. 1922, the def-  
fendents, executed and delivered to the firm of Helm & Barker who  
were then partners engaged in Merchandising in the city of Danville  
, ther certain promissory note, whereby they undertook and promised  
to pay to the said firm the sum of Ninety Nine and 04/100 dollars  
together with 6% interest thereon from date until paid, which said  
note was duly assigned and transferred to the plaintiffs, and is filed  
herewith as part hereof no part of which has ever been paid, although  
same has long since been due.

Plaintiffs say that the claim in this action is for money due  
upon the note aforesaid, and is a just claim and plaintiff's ought  
as they believe to recover thereon the sum of \$99.04 with 6% interest  
thereon from the 1st day of Jan. 1922 until paid.

Plaintiffs further aver that defenents have no property in  
this state or not enough thereof to satisfy plaintiffs demand and  
that the collection of the demand will be endangered by delay in