

Mercer Quarterly Court.

The Riker, Ensminger & Eastland Co.,

Plaintiff.

--VS-- Petition

Elmer McGinnis,

Defendant.

The plaintiff the Riker, Ensminger & Eastland Company states that it is a corporation duly and legally incorporated under the laws of the State of Kentucky, authorized to contract and be contracted with to sue and be sued.

Plaintiff states that the defendant Elmer McGinnis is indebted to it in the sum of ~~*****~~ ^{Ninety} Five Dollars and Forty cents (\$ 95.40) evidenced by a certain promissory note which the defendant on the 2nd, day of April, 1916, executed, signed and delivered to the plaintiff and by the terms of which he promised and agreed to pay to plaintiff the said sum of \$95.40 with interest from the 2nd, day of April, 1916 until paid; plaintiff says that said note was given, signed, executed and delivered by the defendant to the plaintiff with the full and complete understanding that said note was secured by a lien on one ball faced bay mare purchased by the defendant from A.G. Kyle and plaintiff states that it now has a first and prior lien on said mare to secure the payment of the above mentioned note and all interest thereon and the costs of this action.

Plaintiff says that said note is now due, just and unpaid and that no part of same has ever been paid; plaintiff says that by reason of said note being executed for the special payment for the said mare purchased from A.G. Kyle the plaintiff has a first and prior lien upon said mare and is entitled to a sale of said mare for the satisfaction of the above named note, interest and costs of this action.

Plaintiff says that the defendant is about to sell, conceal or remove said property above described and that it has reasonable grounds to believe and does believe that unless prevented by the Court, the property will be sold, concealed or removed by the defendant. Wherefore plaintiff prays for a judgment against the defendant for the said sum of \$95.40 with six per cent per annum interest thereon from the 2nd, day of April, 1916 until paid and the costs of this action, for an order directing the sale of the above mentioned property for the satisfaction of the above mentioned named amount interest and costs.