

Mercer Quarterly Court-

J.L.Gritton-

Plff-

VS- Petition.

D.M.Brown-

Dft.

PAR: 1. The plaintiff, J.L.Gritton, states that on the 21 day of January, 1921, the defendant, D.M.Brown, executed and delivered to him for value received his certain promissory note for the sum of \$125.00, due and payable in 6 months from date with interest thereon from date until paid; that on the 15th day of April, 1921, there was paid on said note the sum of \$20.00; that on the 11th day of October, 1921, there was paid on this note the sum of \$20.00. He says that no other sums have been paid thereon and that the balance of said note is long past due and unpaid though payment has been repeatedly demanded.

Wherefore, Etc.

PAR: 2. The plaintiff without waiving any of the allegations of paragraph No. 1, but reaffirming and readopting them as fully as if set out herein and for other and further cause of action against the defendant alleges that in the year 1921, he sold and delivered to the defendant at his special instance and request goods and merchandise to the value of \$12.47; that said account is past due and unpaid. The said note and account are filed herewith and made a part hereof and marked "A" & "B" respectively for identification. He says that this is an action for money due upon a contract and that it is just and due and plaintiff ought to recover thereon said amounts and interest thereon from date. He says that defendant has no property in this State subject to execution, or not enough thereof to satisfy the plaintiff's demands and the demands of the defendant's creditors and that the collection of the said demand ^{after judgment} will be endangered by delay in obtaining a judgment and a return of no property found.

Wherefore plaintiff prays for a judgment against the defendant in the sum of the above amounts with interest thereon from date and for a general order of attachment against the property of the defendant including a summons against the Ohio Valley Fire & Marine Insurance Co. & The American Alliance Insurance Company, of New York. He prays for all relief.

Subscribed and sworn to before me by J.L.Gritton, Jan. 18, 1921.

R. Black
Examiner Mercer County, Ky.