

John Tyler-

Plff-

Vs- Petition In Equity-

Olia Dearing-

Dft-

The plaintiff, John Tyler, states that the defendant, Olia Dearing, is indebted to him in the sum of \$59.00 with interest thereon at the rate of 6% from the 8th day of August, 1925, until paid; that at the date of August 8th, 1925, the defendant executed and delivered to this plaintiff as security for the payment of said debt a chattel mortgage on the following described personal property, To- Wit: One Post Buggy and roached mane horse named Jim and of ~~black~~ bay color and about 7 years of age; also, about 2 1/2 acres of tobacco then growing on the farm of Obe Lester, in Mercer County, Ky.

He says no part of said debt or interest thereon has ever been paid and that same has been due since January 1, 1925.

Wherefore plaintiff prays for a judgment for \$59.00 with interest thereon from the 8th day of August, 1925, until paid and all the costs of this action and that plaintiff be adjudged to have a lien on said mortgaged property described herein as security for the satisfaction of the judgment obtained herein and for a sale of said property to satisfy said debt, interest and costs of this action and for all relief to which he is entitled-

Subscribed and sworn to before me by John Tyler, Jan- 23, 1925-

J. H. Tyler
R. L. Black

Examiner Mercer County, Ky-

Affidavit-

The affiant, John Tyler, says that this is an action to enforce a mortgage of personal property; that defendant is about to sell, convey, or otherwise dispose of said property and that he has reasonable grounds to believe and does believe that unless prevented by the Court said property will be disposed of to the loss and detriment of this affiant. Wherefore he asks for a special order of attachment against said Horse, Buggy, and tobacco described in the above petition and in this affidavit as a horse 7 years old, Post buggy, and about 2 1/2 acres of tobacco on the farm of Obe Lester-

Subscribed and sworn to before me by John Tyler, Jan- 23, 1925-

J. H. Tyler
R. L. Black
Ex- Mercer Co. Ky -