

FLOYD CIRCUIT COURT

THE BANK JOSEPHINE, PLAINTIFF.

VS: ANSWER AND CROSS PETITION
OF DEFENDANT, ED HILL, against
DEFENDANT, JOE WHITAKER.

JOE WHITAKER, ET AL., DEFENDANTS.

Comes Defendant, Ed Hill, and for answer herein, and for cross-petition against his co-defendant, Joe Whitaker, and says, it is true, and he herewith alleges, that on the 22nd day of October, 1931, S. C. Allen, and Defendant, Joe Whitaker, as joint makers, made, executed, signed and delivered to this answering Defendant, and Plaintiff in Cross Petition, a certain promissory note in which and by which the said S. C. Allen and Joe Whitaker, promised and agreed, to pay to the order of Plaintiff in Cross Petition, Ed Hill, the sum of One Hundred (\$100.00) Dollars, four months after the date thereof, at The Bank Josephine, Prestonsburg, Kentucky; that thereafter, and before the maturity of said note the same was endorsed by Plaintiff in cross Petition, and thereafter and before the maturity of said note, the same was discounted by and to the Plaintiff, The Bank Josephine, Prestonsburg, Kentucky.

Plaintiff in cross Petition, Ed Hill, says further that said note became due and payable at the place where payable, four months from the date thereof, to-wit: February 22, 1932; that said note is just, past due and entire-