

MAGOFFIN

CIRCUIT

COURT

JOHN J. HOWARD AND
SARAH HOWARD,

PLAINTIFFS.

-Against- // PETITION IN EQUITY.

WOODFORD COAL COMPANY, INC.,
AND N. P. HOWARD,

DEFENDANTS.

The plaintiffs, John J. Howard and Sarah Howard, say that they are citizens and residents of Magoffin County, Kentucky.

That the defendant, Woodford Coal Company, is a corporation, organized, created and existing under and by virtue of the laws of the State of Kentucky, with power among other things to sue and be sued, contract and be contract and to plead and be impleaded in its corporate name aforesaid, Woodford Coal Company. That the defendant, N. P. Howard is a citizen and resident of Magoffin County, Kentucky, and is the duly appointed, authorized and acting agent of the defendant, Woodford Coal Company.

That heretofore on the 23rd day of February, 1916, the said defendant, Woodford Coal Company, by and through its duly authorized and acting agent, N. P. Howard, applied to the plaintiffs herein for contract of sale of the mineral in, on and under the lands hereinafter described; and that on the 23rd day of February, 1916, the plaintiffs herein entered into a contract in writing with the defendant, Woodford Coal Company, whereby and wherein for and in consideration of the sum of \$1500.00, stated to be