

State of Colorado

County of Chaffee

In the District Court -

J. A. Stead

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The North Fork Consolidated

Mining and Tunnel Company

Complaint.

Complaint
filed
July 13, 1882
(over)

The said J. A. Stead complains of the said defendant Company and for causes alleges as follows to-wit:

1st

That said defendant is a corporation duly organized under the laws of the State of Pennsylvania and is accordingly a corporation foreign to this State -

2nd

That said corporation as a foreign corporation, carries on and conducts a business in this State, under and according to the laws thereof, viz: the business of mining among others, in the County aforesaid, and has its principal office in this State at Mayville in said County of Chaffee.

3rd

That on or about the 1st day of July 1882 said defendant Company was indebted to said plaintiff for goods wares and merchandize sold and delivered to said Company or its Agents or to various parties upon orders from said

Company or its Agents, for its use and benefit,
to the amount of thirteen hundred dollars
\$1300 ⁵⁰/₁₀₀ + ⁵⁰/₁₀₀

That said defendant has not paid said amount or any portion thereof though often requested so to do, and the same is now due and unpaid to plaintiff -

And further complaining plaintiff alleges as follows.
That on or about May 2nd 1882 said defendant Company was indebted to the firm of Webb & Corbin a firm composed of E. A. Webb and E. W. Corbin and doing business in said County, to the amount of one hundred and eighty three dollars & ¹³/₁₀₀, for goods wares and merchandize sold and delivered to said Company or to various persons upon orders of said Company or its duly authorized Agents, all for its own use or benefit -

That on the 12th day of July 1882 said claim was assigned for value to this plaintiff by said Webb & Corbin who now holds it -

That defendant has not paid said amount of \$183 ¹³/₁₀₀ or any part thereof though often requested so to do -

And further complaining plaintiff alleges that on or about June 1st 1882 said defendant was indebted to a firm known as Shoups & Coburn composed of W. V. Shoups and W. H. Coburn, doing business in said County,

\$807 $\frac{16}{100}$

1 to the amount of eight hundred seven dol-
2 lars & $\frac{16}{100}$, for goods wares and merchandize
3 sold and delivered said defendant for its use
4 and benefit, for horses, wagons and teams
5 hired to defendant for its duly authorized
6 Agents for its use and benefit, and for stabling
7 the horses and teams of said defendant -
8 That on or about July 12th 1882 said Shouyo
9 & Bobum assigned and transferred said
10 claim to this plaintiff for value -
11 That said defendant has not paid said
12 \$807 $\frac{16}{100}$ or any part thereof though often
13 requested so to do -

6th

\$238 $\frac{76}{100}$
~~238~~

15 That further complaining plaintiff al-
16 leges that on or about July 5th 1882 said
17 defendant was indebted to George Sullivan
18 in the sum of two hundred & thirty eight
19 dollars & $\frac{76}{100}$, for goods wares and merchandize
20 sold and delivered said defendant on its Agents
21 or to other persons upon orders of said defen-
22 dant or its Agents, and all for its use or bene-
23 fit; for labor and services done and rendered
24 said defendant for its use and benefit -
25 That on or about July 12th 1882 said George
26 Sullivan assigned and transferred said claim
27 to this plaintiff, who now holds the same -
28 That said defendant has not paid said
29 claim of \$238 $\frac{76}{100}$ or any part thereof, though
often requested so to do.

7th
p. 31

And further complaining plaintiff alleges,
That on or about July 5th 1882 said defen-
dant was indebted to one George Rock in the
sum of three hundred & eighty six dollars & ²⁶/₁₀₀
for goods wares and merchandize sold and de-
livered said defendant or its Agents or to va-
rious persons upon orders given by said defen-
dant or its agents; for labor done and ser-
vices rendered said defendants or its agents;
All of which goods &c. labor &c. were for defen-
dants use and benefit -

That on or about July 12th 1882 said George Rock
assigned and transferred said claim for value
to this plaintiff, who now holds the same -
That said defendant has not paid said \$386 ²⁶/₁₀₀
or any part thereof though often requested
so to do -

8th

And further complaining plaintiff alleges
that said defendant was on or about July
5th 1882 indebted to V. C. Davenport ^{to the}
amount of one hundred & sixty four dollars & ⁹⁰/₁₀₀ for
goods wares and merchandize sold and deliv-
ered said defendant or its agents, or to various
parties upon orders given by said defendant
or its Agent; and for labor done ^{for} and services
rendered said defendant or its Agents -

That on July 12th 1882 said V. C. Daven-
port assigned and transferred said claim
to this plaintiff for value, who now holds it.

\$386 ²⁶/₁₀₀

\$164 ⁹⁰/₁₀₀

to this plaintiff for value who now hold
the same -

That said defendant has not paid said \$479¹⁶
or any part thereof though often requested
so to do -

11th

And plaintiff alleges that all the goods
wares and merchandize furnished as aforesaid
in the various counts, all labor done and
services rendered or cash loaned, was to
said defendant for its use and benefit, or
at the special instance and request of de-
fendant for its use and benefit - And that
when furnished to Agents or by order of Agents,
that such was done for and by Agents act-
ing for and on behalf of said Company and with
full authority so to do -

Wherefore plaintiff prays judgment
against said defendant for the sum
of Thirty seven hundred & thirty seven
dollars & ⁹²/₁₀₀, with interest according to
law -

And his costs in this behalf expended

Rhett & Hobson
P. q.

J. H. Stead
by Counsel

DUPLICATE
SEE BACK
SIDE

\$807 ¹⁶/₁₀₀

1 to the amount of eight hundred & seven dol-
 2 lars & ¹⁶/₁₀₀, for goods wares and merchandize
 3 sold and delivered said defendant for its use
 4 and benefit, for horses, wagons and teams
 5 hired to defendant for its duly authorized
 6 Agents for its use and benefit, and for stabling
 7 the horses and teams of said defendant -
 8 That on or about July 12th 1882 said Shouyo
 9 & Bobum assigned and Transferred said
 10 claim to this plaintiff for value -
 11 That said defendant has not paid said
 12 \$807 ¹⁶/₁₀₀ or any part thereof though often
 13 requested so to do -

6th

\$238 ⁷⁶/₁₀₀
36
27

15 That further complaining plaintiff al-
 16 leges that on or about July 5th 1882 said
 17 defendant was indebted to George Sullivan
 18 in the sum of two hundred & thirty eight
 19 dollars & ⁷⁶/₁₀₀, for goods wares and merchandize
 20 sold and delivered said defendant on its Agents
 21 or to other persons upon orders of said defen-
 22 dant or its Agents, and all for its use or bene-
 23 fit; for labor and services done and rendered
 24 said defendant for its use and benefit -
 25 That on or about July 12th 1882 said George
 26 Sullivan assigned and transferred said claim
 27 to this plaintiff, who now holds the same -
 28 That said defendant has not paid said
 29 claim of \$238 ⁷⁶/₁₀₀ or any part thereof, though
 30 often requested so to do.