

E.V.Graham Dr.

To George Gabhart.

Counter-Claim

1921,

Jan., To Damage to automobile at Salt river bridge on Bohontown road  
by running buggy and horse into his (Gabhart's) machine, caused by  
and contributory negligence  
carelessness on the part of Graham, and his brother, his servant  
the two being  
and agent, in charge of same ----- \$30.00

This is the law in the case  
If you believe from the evidence that the  
Dft was running at a high rate of speed  
& did not use the necessary precaution nor did  
not give the proper signal you will  
find for the Plff. not to exceed \$2500  
we pray for \$1500  
C. R. Leonard

If you believe that the dft used  
such precaution as was necessary to  
prevent such accident you will find  
for the dft