

Injury to barn by improper and insufficient bracing,  
and other inferior and <sup>in-</sup>experienced workmanship on same

\$50.00

Total

\$105.00

They aver and charge that they have been damaged said sums, in this that it will require ~~x~~ said amounts to replace and to complete the barns in a complete condition and in a workmanlike manner, and that even then the barns will always be inferior and weak, and subject to be shaken by winds and to blow down, and he avers and charges that in their present condition they are so inferior and weak that insurance cannot be secured on them against wind and storm.

3.....Plaintiffs ~~xxxxxxx~~ bought from debts two cords of wood <sup>for</sup> \$2.00 for which they are indebted to them at this time, and said plffs are each and all of them totally insolvent, and he pleads this as a set off against any amount due to the plffs for said barns, if anything.

4.....For further set off against the plaintiffs, the defendants aver and charge that during the spring and summer of 1914 they employed the plffs to lay off, mark off and outline for them the foundation for a tobacco barn; that said work included the setting of pins and markings by which to set the stone and cement pillars and foundations; that the plffs agreed and undertook to do said work for a consideration paid them.

They state that the plaintiffs did said work of laying off and marking out said foundation so negligently and wrecklessly, as that the debts in setting the foundations and exercising ordinary care in doing so incorrectly set the stone and cement work thereof, and dug the holes for same at the wrong places, doing the same in reliance on the work of the plffs as correct in marking and laying off the same.

They say that the plaintiffs wilfully and intentionally set the marks for said foundation at the wrong places, and thereby knowingly induced the defendants <sup>relying on Plffs work as correct</sup> to dig their holes at the wrong places and to set their cement and stone at improper and wrong places in setting said foundations, all of which was for the purpose of harassing and injuring these defendants.