

MERCER QUARTERLY COURT

Vardeman Sallee,

Plff

-vs- Answer

I W Scott.

Deft

The Deft I.W Scott, ~~XXXXXX~~ reserving the right to plead further orally, says that he denies that that the post holes dug by him were four and a half, or five feet deep, or any greater depth than four feet. He denies that he carelessly or negligently left said end post holes open, for any length of time. He denies that said post holes were left open by him. He denies that through any carelessness or negligence ~~XXXXXX~~ of the Deft, the mare of the Plff fell into one of said holes, or that she was thereby killed. He denies that said mare was killed by falling into said hole. He denies that said mare was of the value of \$40. or any sum. He denies that the Plff has been damaged in any sum.

Paragraph 2

The Deft reaffirming and still relying upon the denials in the first paragraph, for other and further defense to Plff's action, says that there was ~~XXXXXX~~ prior to the acts complained of in the Plff's statement and at the time thereof, a law in force in the 8th ^{precinct} ~~district~~ of Mercer County, wherein said accident occurred, prohibiting any stock from running at large upon the highway within said precinct, said law having put in force by a vote, legally taken ~~XXXXXX~~ in said precinct and recorded upon the ~~XXXX~~ records of the Mercer County Court, and that the Plff carelessly and negligently permitted his horse to run at large upon the Lexington & Harpsburg turnpike, the highway upon which said accident occurred and that but for the Plff's carelessness and negligence said accident