

FLOYD CIRCUIT COURT

JACK BRANHAM

PLAINTIFF

VS

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ANSWER, COUNTERCLAIM AND
COUNTER GROUND OF CONTEST
OF THE DEFENDANTS, HAROLD
BAILEY AND GUY CHILDERS.

HAROLD BAILEY, ETC.,

DEFENDANTS

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The defendants, Harold Bailey and Guy Childers, for answer to the petition and for counterclaim and counter ground of contest against the plaintiff, Jack Branham, deny that the plaintiff is over the age of twenty-four years. Deny that he has been or is a citizen or resident of Floyd County, Kentucky, for more than three or any number of years next preceding the November election, 1935, or that he is a qualified voter within Floyd County, Kentucky; deny that he has completed at least the eighth grade or any of the grades in the common schools of the State of Kentucky. Deny that plaintiff does not hold or discharge the duties of any civil or political office, deputyship or agency of Floyd County, Kentucky. Deny that plaintiff possesses all or any of the statutory or constitutional qualifications for members of the Board of Education of Floyd County, Kentucky. Deny that heretofore or not more than sixty days nor