

PHARES A. HUGHES,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
vs.	X	AT LAW
DALTON A. SHEWBART,	X	CASE NO. <u>5647</u>
Defendant.	X	
	X	

Plaintiff claims of the Defendant the sum of SEVENTY FIVE THOUSAND AND NO/100 (\$75,000.00) DOLLARS, damages for that heretofore and on, to-wit, June 17, 1963, the Defendant DALTON A. SHEWBART, so negligently operated an automobile on U. S. Highway 98, at or near its intersection with Alabama State Highway 104, both of said roads being public roads in Baldwin County, Alabama, so as to cause said automobile to then and there collide with an automobile operated by the Plaintiff on said U. S. Highway 98, and as a direct and proximate consequence of the negligence of the Defendant as aforesaid, the Plaintiff's automobile was bent, broken, and damaged and he lost the use thereof over a period of time and the Plaintiff suffered the following personal injuries: He was made sick, sore and lame; he was caused to suffer severe mental and physical pain and anguish, still so suffers, and will so suffer in the future; he suffered severe lacerations and abrasions about his head, face and body; he was permanently scarred, disfigured, and otherwise permanently injured; he was caused to incur and did, in fact incur, hospital bills, doctor's bills and other medical expenses in and about the care and treatment of his injuries; and he was caused to lose time from his employment, for all of which he claims damages as aforesaid.

FILED

JUL 24 1963

ALICE J. DUCK, CLERK
REGISTER

H. Hayden Rector
H. HAYDEN RECTOR
Attorney for Plaintiff

CUNNINGHAM & BOUNDS
Attorneys for Plaintiff

BY: 
RICHARD BOUNDS

Plaintiff demands a trial by jury.


H. HAYDEN RECTOR

Defendant's Address:

Rt. 2
Vina, Alabama

PHARES A. HUGHES,

PLAINTIFF,

VS.

DALTON A. SHEWBART,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY
~~MOBILE COUNTY, ALABAMA~~

No. 5647

INTERROGATORIES TO DEFENDANT

DALTON A. SHEWBART

Comes the plaintiff in the above styled cause, and desiring the testimony of the defendants, propounds the following interrogatories to be answered separately and severally in the manner and form provided by law, viz:

1. (a) State your correct name, age, residence address and business address.
- (b) Is your name correctly stated in the complaint on file in this cause?
- (c) If you state that your name is not correctly stated, then state the correct way that you could be designated as a party plaintiff or a party defendant in an action at law:
 - (1) At the time that the accident which is made the basis of this suit occurred;
 - (2) At the time that you answer these interrogatories.
2. (a) State whether you are a person, firm, or corporation.
- (b) If you state that you are a partnership, then state the name of each and every partner composing said partnership, and the name under which the partnership does business.
- (c) If you state that you are a corporation, state on what date you were incorporated and at what place.
3. (a) Describe completely and in detail the vehicle occupied or owned by you on the occasion of the accident made the basis of this suit, stating in your answer the make, model, year, and body style of same.
- (b) State the name and address of the owner of said motor vehicle on the date of said accident.
- (c) State the name and address of the driver of said vehicle on said occasion.
- (d) Describe completely and in detail every item of damage sustained by said vehicle.
- (e) Give the amount of each repair estimate obtained on said damage and give the name and address of the person making said repair estimate.
- (f) State whether or not any of said damage was repaired, and, if so, give the amount of the repair bill and the name and address of the person, firm, or corporation who made said repairs.
- (g) Describe the condition of the brakes, signal device, steering apparatus, tires, and lighting equipment on said motor vehicle at the time of the accident made the basis of this suit.
- (h) When had the brakes, signal device, steering apparatus, lights and tires on said motor vehicle last been inspected prior to said accident and by whom?
4. (a) If you have stated that the owner of the vehicle which collided with the vehicle in which plaintiff was riding was not the driver on the occasion of said accident, explain fully and in detail the presence of the driver in said vehicle.
- (b) State who was the employer of the driver of the vehicle which collided with the vehicle in which plaintiff was riding at the time that said accident occurred.

- (c) State on whose business or behalf said driver was acting at the time that said accident occurred.
 - (d) State the hours of work which said driver had at the time of said accident.
5. (a) State the number of persons occupying the motor vehicle which collided with the vehicle in which plaintiff was riding and state specifically how and in what manner each of said occupants were located in said vehicle on said occasion.
- (b) State fully the purpose of the trip you were making at the time of the accident made the basis of this suit.
- (c) From what point had you departed?
- (d) What was your destination?
- (e) Were you performing a mission, errand, or duty for anybody whatsoever? If so, state the nature of same and the name and address of the person for whom you were performing it.
- (f) Give the name and address of each and every person or firm who had any interest whatsoever in the trip that was being made by the driver of the vehicle which collided with the plaintiff on the occasion of said accident, and state the nature of said interest and the connection of said person or firm with the trip.
6. Prepare and attach to your answers to these interrogatories a map portraying the scene of the accident and the physical objects involved in the accident made the basis of this suit and designate on said map the following:
- (a) The point of impact and skid marks leading up to and from same;
 - (b) The resting place of the vehicles after the accident;
 - (c) Where you were located when you first saw the plaintiff's vehicle;
 - (d) Where the plaintiff's vehicle was located when first seen by you;
 - (e) The placement of any other vehicles or physical objects which had anything to do with said accident.
7. State whether or not the accident made the basis of this suit occurred at an intersection of streets or avenues, and if so, then state:
- (a) At what intersection of streets or avenues said accident occurred;
 - (b) Whether any buildings or objects were located within any of the four corners of the intersection which would obscure the vision of any person approaching the intersection;
 - (c) State how far you, in your judgment, could see to the left and right on each of the streets entering the intersection and down each of the intersecting streets when you approached from a point fifty feet from said intersection.
 - (d) Describe the locus of said accident with reference to the contour of the land, the grade or curve of the road, highway or intersection, and any physical structures located within two hundred feet of the place of the accident;
 - (e) Describe any traffic controls located at the scene of the accident and the operation of same, stating the directions in which said traffic signals or controls faced.
8. (a) State where the motor vehicle in which plaintiff was riding was located with reference to the point of the impact in the accident made the basis of this suit when you first observed same immediately prior to said accident.
- (b) Did you see the motor vehicle in which plaintiff was riding before the actual collision?
- (c) How many feet was the motor vehicle in which plaintiff was riding from the place of the impact when you first observed same?
- (d) How many feet were you from the point of impact when you first observed the vehicle in which plaintiff was riding?
- (e) Where did the impact occur with reference to the center line of the street on which the vehicle in which plaintiff was traveling?

- (f) Where did the impact occur with reference to the right edge of the street on which your vehicle was traveling?
9. (a) State specifically and in detail exactly how the accident made the basis of this suit occurred and describe chronologically the events that occurred leading up to same as seen by you.
- (b) Describe each and everything which the driver of the vehicle in which plaintiff was riding failed to do to avoid said accident.
- (c) Describe each and everything done by the driver of the vehicle in which plaintiff was riding which contributed to the cause of said accident.
- (d) State each and everything done by you or which you omitted to do, which contributed proximately to cause the accident.
- (e) Describe each negligent act or omission of the driver of the vehicle in which plaintiff was riding on said occasion.
10. (a) State whether or not any of the occupants in any of the vehicles involved in the accident made the basis of this suit were intoxicated or drinking intoxicating beverages at the time of the said accident.
- (b) Give the name and address of each of said persons who was drinking or who was intoxicated.
- (c) State what each of said persons was drinking, where he or she had obtained same, the quantity or amount consumed, and the time and place where same was drunk.
11. State, according to your best judgment the speed of the vehicle in which plaintiff was riding at the following points:
- (a) When you first observed same prior to the accident made the basis of this suit;
- (b) At a point 300 feet from the place where the impact occurred;
- (c) At a point 200 feet from the place where the impact occurred;
- (d) At a point 100 feet from the place where the impact occurred;
- (e) At a point 50 feet from the place where the impact occurred;
- (f) At a point 25 feet from the place where the impact occurred;
- (g) At a point 10 feet from the place where the impact occurred;
- (h) At the time of the impact;
- (i) Immediately after the impact.
12. (a) State in what direction and along what street or avenue each of the motor vehicles involved in the accident made the basis of this suit was traveling on the occasion of said accident.
- (b) State in your best judgment, in number of feet, the width of each of said streets or avenues or highways.
- (c) If either of the vehicles involved in the accident made the basis of this suit was engaged in making a turn from a direct line of travel, describe same, and the course followed with reference to the center of the intersection and also the four corners of same, and with reference to the center line of the street, avenue or highway on which said motor vehicle had been traveling prior to said turn.
13. (a) State fully, specifically and in detail each and every act or thing done by the operator of the vehicle owned or occupied by you at the time of the accident made the basis of this suit during the last 100 feet of said vehicle's approach to the point of said collision, stating in your answer the chronological order in which said operator did each of said acts or things.
- (b) Describe each change in the course of travel made by the vehicle in which plaintiff was riding immediately prior to said accident.
- (c) Describe each change in the course of travel made by the vehicle in which you were riding immediately prior to the accident herein sued on.
14. (a) State whether or not the brakes on the vehicle occupied by you or owned by you at the time of the accident sued on were applied prior to the collision.

- (b) If so, state in your best judgment the speed in miles per hour said vehicle was traveling at the moment the brakes were applied.
 - (c) State in your best judgment the distance in number of feet said vehicle traveled from the moment the brakes were applied until said collision occurred
 - (d) State in your best judgment the distance in number of feet said vehicle traveled from the moment the brakes were applied until it came to a stop after the occurrence of the accident made the basis of this suit.
15. (a) State specifically what portion of the vehicles involved in the accident made the basis of this suit first came in contact with each other.
- (b) Describe the portions which next came in contact after the initial impact.
16. (a) State in your best judgment the distance each of the vehicles involved in the accident made the basis of this suit traveled on said occasion from the moment of the collision to the point where each of said vehicles first came to a stop immediately thereafter.
- (b) In what direction did each of said motor vehicles move from the point of said collision until they came to a complete stop?
- (c) Describe each and every skid mark which led up to the point of collision.
- (d) Describe each and every skid mark which extended from the point of collision toward the place where either of the motor vehicles involved in the accident came to rest.
- (e) Locate the point where each motor vehicle came to rest with reference to the point of impact, the center of the intersection, the four corners of same and the right edge of the street on which it had been traveling.
17. State the speed of the motor vehicle which you owned or occupied, according to your best judgment, at the following points:
- (a) When you were within a distance of 300 feet from the point of impact in the accident made the basis of this suit;
 - (b) When you were 200 feet from the point of impact;
 - (c) When you were 100 feet from the point of impact;
 - (d) When you were 50 feet from the point of impact;
 - (e) When you were 25 feet from the point of impact;
 - (f) When you were 10 feet from the point of impact;
 - (g) At the time of said impact;
 - (h) When you first observed the other vehicle involved in said accident.
18. (a) State whether any horn or other signal was given as a warning by the operator of the vehicles involved in the accident made the basis of this suit prior to the time of the collision.
- (b) If so, describe each of said signals given by each respective driver specifically and in detail.
- (c) State how far distant from the point of collision each vehicle was located at the time said signal was given.
- (d) If any signals for stopping or turning were given by each driver immediately prior to said collision, describe same, and state how far distant from the point of impact said signal was given by each driver respectively.
19. (a) State whether or not there were any other vehicles at or near the scene of the accident at the time of and immediately prior to the occurrence of same
- (b) If so, state the number of such other vehicles and where they were located with reference to the point of the accident at the moment same occurred.
- (c) State whether or not any of the other vehicles located at or near the scene of the accident played any part, or contributed in any manner, to cause the collision made the basis of this suit.

- (d) Give the name and address of each driver or owner of each of said vehicles.
20. (a) Did you make any statements in the presence of the operator of any of the vehicles involved in the collision made the basis of this suit following the occurrence of same?
- (b) If so, state when, where and what was said by you.
- (c) Did the operator of the vehicle in which plaintiff was riding make any statement in your presence following the occurrence of the accident, and if so, state when, where and what was said by said driver.
- (d) Give the name and address of each and every person who was present when the accident made the basis of this suit occurred.
- (e) Give the name and address of each and every person who was present when any statements were made either by you or the driver of the vehicle in which plaintiff was riding following the occurrence of the accident made the basis of this suit.

CUNNINGHAM & BOUNDS
ATTORNEYS FOR PLAINTIFF


RICHARD BOUNDS

STATE OF ALABAMA)

COUNTY OF MOBILE)

Personally appeared before me, the undersigned Notary Public, in and for said County and State, RICHARD BOUNDS, who having been first duly sworn, deposes and says that he is attorney for the Plaintiff in the above styled cause and that if the foregoing interrogatories are truthfully answered, the answers will be material for the Plaintiff on a trial of said cause.


RICHARD BOUNDS

Sworn to and subscribed before me on
this 23 day of July, 1963.


NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

FILED

JUL 24 1963

ALICE J. DUCK, CLERK
REGISTER

PHARES A. HUGHES,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
vs.	X	AT LAW
DALTON A. SHEWBART,	X	
Defendant.	X	CASE NO. <u>5647</u>
	X	

Plaintiff claims of the Defendant the sum of SEVENTY FIVE THOUSAND AND NO/100 (\$75,000.00) DOLLARS, damages for that heretofore and on, to-wit, June 17, 1963, the Defendant DALTON A. SHEWBART, so negligently operated an automobile on U. S. Highway 98, at or near its intersection with Alabama State Highway 104, both of said roads being public roads in Baldwin County, Alabama, so as to cause said automobile to then and there collide with an automobile operated by the Plaintiff on said U. S. Highway 98, and as a direct and proximate consequence of the negligence of the Defendant as aforesaid, the Plaintiff's automobile was bent, broken, and damaged and he lost the use thereof over a period of time and the Plaintiff suffered the following personal injuries: He was made sick, sore and lame; he was caused to suffer severe mental and physical pain and anguish, still so suffers, and will so suffer in the future; he suffered severe lacerations and abrasions about his head, face and body; he was permanently scarred, disfigured, and otherwise permanently injured; he was caused to incur and did, in fact incur, hospital bills, doctor's bills and other medical expenses in and about the care and treatment of his injuries; and he was caused to lose time from his employment, for all of which he claims damages as aforesaid.

FILED

JUL 24 1963

ALICE J. DUCK, CLERK
REGISTER

H. Hayden Rector
H. HAYDEN RECTOR
Attorney for Plaintiff

CUNNINGHAM & BOUNDS
Attorneys for Plaintiff

BY: Richard Bounds
RICHARD BOUNDS

Plaintiff demands a trial by jury.

H. Hayden Rector
H. HAYDEN RECTOR

Defendant's Address:

Rt. 2
Vina, Alabama

PHARES A. HUGHES,	:	IN THE CIRCUIT COURT OF
	:	BALDWIN COUNTY
	:	MOBILE COUNTY, ALABAMA
PLAINTIFF,	:	
	:	
VS.	:	No. <u>5647</u>
	:	
DALTON A. SHEWBART,	:	
	:	
DEFENDANT	:	

INTERROGATORIES TO DEFENDANT
DALTON A. SHEWBART

Comes the plaintiff in the above styled cause, and desiring the testimony of the defendants, propounds the following interrogatories to be answered separately and severally in the manner and form provided by law, viz:

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- (b) Is your name correctly stated in the complaint on file in this cause?
- (c) If you state that your name is not correctly stated, then state the correct way that you could be designated as a party plaintiff or a party defendant in an action at law:
 - (1) At the time that the accident which is made the basis of this suit occurred;
 - (2) At the time that you answer these interrogatories.
2. (a) State whether you are a person, firm, or corporation.
- (b) If you state that you are a partnership, then state the name of each and every partner composing said partnership, and the name under which the partnership does business.
- (c) If you state that you are a corporation, state on what date you were incorporated and at what place.
3. (a) Describe completely and in detail the vehicle occupied or owned by you on the occasion of the accident made the basis of this suit, stating in your answer the make, model, year, and body style of same.
- (b) State the name and address of the owner of said motor vehicle on the date of said accident.
- (c) State the name and address of the driver of said vehicle on said occasion.
- (d) Describe completely and in detail every item of damage sustained by said vehicle.
- (e) Give the amount of each repair estimate obtained on said damage and give the name and address of the person making said repair estimate.
- (f) State whether or not any of said damage was repaired, and, if so, give the amount of the repair bill and the name and address of the person, firm, or corporation who made said repairs.
- (g) Describe the condition of the brakes, signal device, steering apparatus, tires, and lighting equipment on said motor vehicle at the time of the accident made the basis of this suit.
- (h) When had the brakes, signal device, steering apparatus, lights and tires on said motor vehicle last been inspected prior to said accident and by whom?
4. (a) If you have stated that the owner of the vehicle which collided with the vehicle in which plaintiff was riding was not the driver on the occasion of said accident, explain fully and in detail the presence of the driver in said vehicle.
- (b) State who was the employer of the driver of the vehicle which collided with the vehicle in which plaintiff was riding at the time that said accident occurred.

- (c) State on whose business or behalf said driver was acting at the time that said accident occurred.
 - (d) State the hours of work which said driver had at the time of said accident.
5. (a) State the number of persons occupying the motor vehicle which collided with the vehicle in which plaintiff was riding and state specifically how and in what manner each of said occupants were located in said vehicle on said occasion.
- (b) State fully the purpose of the trip you were making at the time of the accident made the basis of this suit.
- (c) From what point had you departed?
- (d) What was your destination?
- (e) Were you performing a mission, errand, or duty for anybody whatsoever? If so, state the nature of same and the name and address of the person for whom you were performing it.
- (f) Give the name and address of each and every person or firm who had any interest whatsoever in the trip that was being made by the driver of the vehicle which collided with the plaintiff on the occasion of said accident, and state the nature of said interest and the connection of said person or firm with the trip.
6. Prepare and attach to your answers to these interrogatories a map portraying the scene of the accident and the physical objects involved in the accident made the basis of this suit and designate on said map the following:
- (a) The point of impact and skid marks leading up to and from same;
 - (b) The resting place of the vehicles after the accident;
 - (c) Where you were located when you first saw the plaintiff's vehicle;
 - (d) Where the plaintiff's vehicle was located when first seen by you;
 - (e) The placement of any other vehicles or physical objects which had anything to do with said accident.
7. State whether or not the accident made the basis of this suit occurred at an intersection of streets or avenues, and if so, then state:
- (a) At what intersection of streets or avenues said accident occurred;
 - (b) Whether any buildings or objects were located within any of the four corners of the intersection which would obscure the vision of any person approaching the intersection;
 - (c) State how far you, in your judgment, could see to the left and right on each of the streets entering the intersection and down each of the intersecting streets when you approached from a point fifty feet from said intersection.
 - (d) Describe the locus of said accident with reference to the contour of the land, the grade or curve of the road, highway or intersection, and any physical structures located within two hundred feet of the place of the accident;
 - (e) Describe any traffic controls located at the scene of the accident and the operation of same, stating the directions in which said traffic signals or controls faced.
8. (a) State where the motor vehicle in which plaintiff was riding was located with reference to the point of the impact in the accident made the basis of this suit when you first observed same immediately prior to said accident.
- (b) Did you see the motor vehicle in which plaintiff was riding before the actual collision?
- (c) How many feet was the motor vehicle in which plaintiff was riding from the place of the impact when you first observed same?
- (d) How many feet were you from the point of impact when you first observed the vehicle in which plaintiff was riding?
- (e) Where did the impact occur with reference to the center line of the street on which the vehicle in which plaintiff was traveling?

- (f) Where did the impact occur with reference to the right edge of the street on which your vehicle was traveling?
9. (a) State specifically and in detail exactly how the accident made the basis of this suit occurred and describe chronologically the events that occurred leading up to same as seen by you.
- (b) Describe each and everything which the driver of the vehicle in which plaintiff was riding failed to do to avoid said accident.
- (c) Describe each and everything done by the driver of the vehicle in which plaintiff was riding which contributed to the cause of said accident.
- (d) State each and everything done by you or which you omitted to do, which contributed proximately to cause the accident.
- (e) Describe each negligent act or omission of the driver of the vehicle in which plaintiff was riding on said occasion.
10. (a) State whether or not any of the occupants in any of the vehicles involved in the accident made the basis of this suit were intoxicated or drinking intoxicating beverages at the time of the said accident.
- (b) Give the name and address of each of said persons who was drinking or who was intoxicated.
- (c) State what each of said persons was drinking, where he or she had obtained same, the quantity or amount consumed, and the time and place where same was drunk.
11. State, according to your best judgment the speed of the vehicle in which plaintiff was riding at the following points:
- (a) When you first observed same prior to the accident made the basis of this suit;
 - (b) At a point 300 feet from the place where the impact occurred;
 - (c) At a point 200 feet from the place where the impact occurred;
 - (d) At a point 100 feet from the place where the impact occurred;
 - (e) At a point 50 feet from the place where the impact occurred;
 - (f) At a point 25 feet from the place where the impact occurred;
 - (g) At a point 10 feet from the place where the impact occurred;
 - (h) At the time of the impact;
 - (i) Immediately after the impact.
12. (a) State in what direction and along what street or avenue each of the motor vehicles involved in the accident made the basis of this suit was traveling on the occasion of said accident.
- (b) State in your best judgment, in number of feet, the width of each of said streets or avenues or highways.
- (c) If either of the vehicles involved in the accident made the basis of this suit was engaged in making a turn from a direct line of travel, describe same, and the course followed with reference to the center of the intersection and also the four corners of same, and with reference to the center line of the street, avenue or highway on which said motor vehicle had been traveling prior to said turn.
13. (a) State fully, specifically and in detail each and every act or thing done by the operator of the vehicle owned or occupied by you at the time of the accident made the basis of this suit during the last 100 feet of said vehicle's approach to the point of said collision, stating in your answer the chronological order in which said operator did each of said acts or things.
- (b) Describe each change in the course of travel made by the vehicle in which plaintiff was riding immediately prior to said accident.
- (c) Describe each change in the course of travel made by the vehicle in which you were riding immediately prior to the accident herein sued on.
14. (a) State whether or not the brakes on the vehicle occupied by you or owned by you at the time of the accident sued on were applied prior to the collision.

- (b) If so, state in your best judgment the speed in miles per hour said vehicle was traveling at the moment the brakes were applied.
 - (c) State in your best judgment the distance in number of feet said vehicle traveled from the moment the brakes were applied until said collision occurred
 - (d) State in your best judgment the distance in number of feet said vehicle traveled from the moment the brakes were applied until it came to a stop after the occurrence of the accident made the basis of this suit.
15. (a) State specifically what portion of the vehicles involved in the accident made the basis of this suit first came in contact with each other.
- (b) Describe the portions which next came in contact after the initial impact.
16. (a) State in your best judgment the distance each of the vehicles involved in the accident made the basis of this suit traveled on said occasion from the moment of the collision to the point where each of said vehicles first came to a stop immediately thereafter.
- (b) In what direction did each of said motor vehicles move from the point of said collision until they came to a complete stop?
- (c) Describe each and every skid mark which led up to the point of collision.
- (d) Describe each and every skid mark which extended from the point of collision toward the place where either of the motor vehicles involved in the accident came to rest.
- (e) Locate the point where each motor vehicle came to rest with reference to the point of impact, the center of the intersection, the four corners of same and the right edge of the street on which it had been traveling.
17. State the speed of the motor vehicle which you owned or occupied, according to your best judgment, at the following points:
- (a) When you were within a distance of 300 feet from the point of impact in the accident made the basis of this suit;
 - (b) When you were 200 feet from the point of impact;
 - (c) When you were 100 feet from the point of impact;
 - (d) When you were 50 feet from the point of impact;
 - (e) When you were 25 feet from the point of impact;
 - (f) When you were 10 feet from the point of impact;
 - (g) At the time of said impact;
 - (h) When you first observed the other vehicle involved in said accident.
18. (a) State whether any horn or other signal was given as a warning by the operator of the vehicles involved in the accident made the basis of this suit prior to the time of the collision.
- (b) If so, describe each of said signals given by each respective driver specifically and in detail.
- (c) State how far distant from the point of collision each vehicle was located at the time said signal was given.
- (d) If any signals for stopping or turning were given by each driver immediately prior to said collision, describe same, and state how far distant from the point of impact said signal was given by each driver respectively.
19. (a) State whether or not there were any other vehicles at or near the scene of the accident at the time of and immediately prior to the occurrence of same
- (b) If so, state the number of such other vehicles and where they were located with reference to the point of the accident at the moment same occurred.
- (c) State whether or not any of the other vehicles located at or near the scene of the accident played any part, or contributed in any manner, to cause the collision made the basis of this suit.

- (d) Give the name and address of each driver or owner of each of said vehicles.
20. (a) Did you make any statements in the presence of the operator of any of the vehicles involved in the collision made the basis of this suit following the occurrence of same?
- (b) If so, state when, where and what was said by you.
- (c) Did the operator of the vehicle in which plaintiff was riding make any statement in your presence following the occurrence of the accident, and if so, state when, where and what was said by said driver.
- (d) Give the name and address of each and every person who was present when the accident made the basis of this suit occurred.
- (e) Give the name and address of each and every person who was present when any statements were made either by you or the driver of the vehicle in which plaintiff was riding following the occurrence of the accident made the basis of this suit.

CUNNINGHAM & BOUNDS
ATTORNEYS FOR PLAINTIFF


RICHARD BOUNDS

STATE OF ALABAMA)

COUNTY OF MOBILE)

Personally appeared before me, the undersigned Notary Public, in and for said County and State, RICHARD BOUNDS, who having been first duly sworn, deposes and says that he is attorney for the Plaintiff in the above styled cause and that if the foregoing interrogatories are truthfully answered, the answers will be material for the Plaintiff on a trial of said cause.


RICHARD BOUNDS

Sworn to and subscribed before me on
this 23 day of July, 1963.


NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

FILED
JUL 24 1963
ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5617

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Dalton A. Shewbart

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the

Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Dalton A. Shewbart, Defendant

by

Phars A. Hughes, Plaintiff

Witness my hand this 24 day of July 19 63

Phars A. Hughes, Clerk

No. 5647

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

PHARES A. HUGHES

vs.

Plaintiffs

DALTON A. SHEWBART

Defendants

1. SUMMONS and COMPLAINT

2. Interrogatories

Filed 7-24, 19 63

Alice J. Duck

, Clerk

Defendant's Address:
Vina, Ala
Morgan County

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

July 24, 1963

, Sheriff

I have executed this summons

this, 19

by leaving a copy with

Sheriff

Deputy Sheriff

CUNNINGHAM AND BOUNDS

ATTORNEYS AT LAW
1350 DAUPHIN STREET
P. O. BOX 4486

MOBILE, ALABAMA

ROBERT T. CUNNINGHAM
RICHARD BOUNDS

HEMLOCK 8-6188

July 23, 1963

Mrs. Alice Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed are a complaint and interrogatories
in Hughes vs. Shewbart. Will you please file these papers
and notify us when service has been obtained upon the
Defendant?

Very truly yours,

CUNNINGHAM & BOUNDS

Richard Bounds

RICHARD BOUNDS

RB:ca

Enclosure

P.S. Vina, Ala. is in Franklin County.

RB.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5647

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Dalton A. Shewbart

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the
Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Dalton A. Shewbart, Defendant

by

Phars A. Hughes, Plaintiff

Witness my hand this 24 day of July 19 63

Alice J. Newell, Clerk

Bay Minette, Ala.,

July 29 1963

To the Sheriff of

Franklin County, Russellville, Alabama

I enclose herewith

I & C and return to be served
on Dalton A. Shewhart - at
Vina Ala.

Please serve and return as early as possible.

Jaylow Wilkins

Sheriff Baldwin County, Alabama

(If not found in your county please advise promptly giving information as to present location if possible)

8-10-63

Dear Sheriff

This Subject is in
Camden N.J. Address
801 Morgan St