

1. Allen, Thomas I., Farmer, Gateswood
2. Rivera, Leon W., Farmer, Foley
3. Beverly, John, Salesman, Robertsdale
4. Boomer, Travis, Farmer, Elsieboro
5. Britt, Cecil, Carpenter, Bay Minette
6. Brooks, Horace D., Farmer, Summerdale
7. Bryars, Rudolph H., Brookley Field, Bay Minette
8. Calloway, Thomas Andrew, Seafood Dealer, Gulf Shores
9. Chandler, Jack, Newport, Bay Minette
10. Colgin, Ned, Farmer, Summerdale
11. Creamer, Henry, City Employee, Fairhope
12. Dawson, Roy S., Livestock Dealer, Robertsdale
13. Fell, Russell, Civil Service, Lillian
14. Fell, Walter, Mechanic, Bon Secour
15. Flowers, Edward, Farmer, Bay Minette
16. Guthrie, Hersey, Farmer, Bon Secour
17. Hall, John Sr., Carpenter, Loxley
18. Hammond, Walter W., Grocer, Robertsdale
19. Head, Charlie, Jr., Farmer, Stapleton
20. Houston, Angelo, Clerk, Fairhope
21. James, Dayton, Farmer, Foley
22. Kane, James, Farmer, Loxley
23. Koehler, Charles G., Jr., Banker, Elberta
24. Kriss, Frank, Farmer, Silverhill
25. Little, Bernie, Mechanic, Bay Minette
26. Lundberg, Carl, Newport, Bay Minette
27. Mason, Jimmy, Salesman, Fairhope
28. Matthews, Charles L., F.C.A., Robertsdale
29. McDaniel, Schuler, Farmer, Robertsdale
30. Quinney, Bruce, Mobile Public Work, Daphne
31. Singleton, Art, Public, Rosinton
32. Soesbe, John R., Mechanic, Foley
33. Stripline, Fred, Television Repair, Robertsdale
34. Thomas, Jennings, Farmer, Foley
35. Venson, Cecil, Civil Service, Stapleton
36. Volovcky, Jimmie, Mechanic, Robertsdale
37. Waters, Orville Clyde, Merchant, Bay Minette
38. Yarbrough, George C., Jr., International Paper Co., Bay Minette
39. Amos, Willie, Clerk, Silverhill
40. Conway, James, Mobile Construction, Daphne
41. Gill, R.A., Oil Co., Robertsdale

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HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:
P. O. BOX 123

CABLE ADDRESS:
HAB

TELEPHONE:
432-5511
AREA CODE 205

CHAS. C. HAND
C. S. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREYARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH

August 1, 1967

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

Re: Ridings vs. Barks
Case No. 7576
Our File: LEB 7964

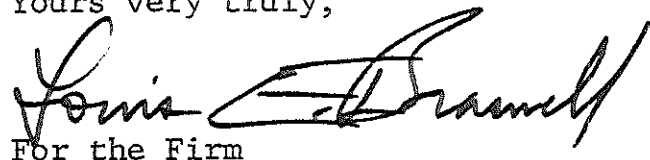
Dear Mrs. Duck:

Enclosed is an amended answer (containing pleas of recoupment) of John F. Barks to be filed appropriately in connection with the above case.

Also enclosed is a motion for the Court to appoint a guardian ad litem for the minor plaintiff.

Please indicate your receipt of these papers on the enclosed carbon copy of this letter and then return the copy to me for my file.

Yours very truly,


For the Firm

LEB.mhb
Enclosure

RONALD LEE RIDINGS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
EDWIN AVON BARKS,)	
JOHN F. BARKS, JOHN F.)	
BARKS, JR., separately)	
and severally,)	
Defendants.)	CASE NO. <u>75-26</u>

INTERROGATORIES TO DEFENDANT EDWIN AVON BARKS

COMES NOW the plaintiff in the above entitled cause and desiring the testimony of defendant Edwin Avon Barks, propounds to the said defendant the following interrogatories as provided under Section 477, et seq., of Title 7, of the Code of Alabama, to be answered by him in writing, under oath:

1. (a) What is your full and complete name?
- (b) What is your present address?
- (c) What was your address on October 11, 1966?
2. (a) Were you the driver of the Ford automobile bearing 1966 Alabama License Tag No. 2-49134 which was involved in an automobile accident with a vehicle driven by plaintiff on October 11, 1966?
- (b) If answer to 2-a is negative, give the full name and address of the operator of the said Ford automobile at the time of the accident made the basis of this suit?
3. (a) Were you the owner of the Ford automobile bearing 1966 Alabama License Tag No. 2-49134 which was involved in an automobile accident with a vehicle driven by Ronald Lee Ridings on October 11, 1966?
- (b) If answer to 3-a is negative, give the full name and address of the owner of said Ford automobile?

4. (a) Explain fully and in detail all circumstances by which you were operating an automobile not registered in your name at the time of the accident made the basis of this suit?
- (b) Give the full name and address of the person from whom you obtained the ignition key to the vehicle which you were operating at the time of the accident?
- (c) When did you obtain the ignition key to the vehicle which you were driving at the time of this accident?
- (d) Under what circumstances did you obtain the ignition key to the vehicle which you were driving at the time of this accident?
5. (a) Were there any other occupants in the vehicle in which you were riding at the time of this accident?
- (b) If answer to 5-a is affirmative, what are the full names and addresses of the other occupants in this vehicle at the time of said accident?
- (c) If answer to 5-a is affirmative, when and where did each of said occupants enter said vehicle?
- (d) What was the destination of said occupants?
- (e) If answer to 5-a is affirmative, what time was said occupants due at their said destination?
6. (a) Describe completely and in detail the vehicle occupied 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) Describe the damage sustained by said vehicle?
- (c) What was the condition of the brakes, signal devices, steering apparatus, tires, and lightning equipment on said vehicle at the time of the accident made the basis of this suit?

- (d) When had the brakes, signal devices, steering apparatus, tires and lights on said motor vehicle last been inspected prior to said accident and by whom?
- 7. (a) What was the purpose of the trip you were making at the time of the accident made the basis of this suit?
- (b) From what point and at what time had you departed?
- (c) What was your destination?
- (d) Were you performing a mission, errand or duty for anybody whatsoever?
- (e) What time were you due at your destination?
- 8. (a) Did this accident occur at the intersection of U. S. Highway 98 and Old U. S. Highway 98 approximately one half mile south of D'Olive Creek in Baldwin County, Alabama?
- (b) If answer to 8-a is negative, what is the location at which the accident occurred?
- (c) On what road and in what direction were you traveling immediately prior to this accident?
- (d) On what road and in what direction was plaintiff traveling immediately prior to this accident?
- (e) Were there any buildings or objects located within any of the four corners of the intersection which obscured your vision as you approached the intersection?
- (f) Were there any stop signs or other traffic controls located at the site of this accident?
- (g) If answer to 8-f is affirmative, describe the sign or traffic control?
- (h) If answer to 8-f is affirmative, was the sign or traffic control visible to traffic traveling on the road on which you were traveling at the time of this accident?

9. (a) Did you see the vehicle operated by Ronald Lee Ridings before the actual collision?
- (b) If answer to 9-a is affirmative, where was the vehicle operated by Ronald Lee Ridings located with reference to the point of impact in this accident when you first observed same prior to said accident?
- (c) How many feet was the motor vehicle in which plaintiff was riding from the place of 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 of the intersection at which this accident occurred?
10. (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) Described each and everything done by the driver of the vehicle in which plaintiff was riding which contributed to the cause of said accident?
- (d) Described 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 the occasion of this accident?
11. (a) State fully, specifically, and in detail each and every act or thing done by the operator of the vehicle 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 course of travel made by the vehicle in which you were riding immediately prior to this accident?
 - (c) Describe each change in the course of travel made by the vehicle operated by plaintiff immediately prior to this accident?
 - (d) In which lane of traffic was your vehicle traveling at the moment of impact, and approximately how far had your vehicle traveled in that lane of traffic before the accident made the basis of this suit?
 - (e) Were you attempting to pass plaintiff's Volkswagen at the time of this accident?
 - (f) If answer to 11-e is affirmative, approximately how far were you from the point of collision when you began to pass said vehicle?
 - (g) If answer to 11-e is affirmative, what was the approximate speed of the vehicle which you were attempting to pass?
 - (h) If answer to 11-e is affirmative, approximately how far had you followed the plaintiff's Volkswagen before attempting to pass said vehicle?
12. (a) Had you consumed any intoxicating beverages within the twelve hours next proceeding the occurrence of this accident?
- (b) If answer to 12-a is affirmative, at what time or times were the intoxicating beverages consumed?

- (c) If answer to 12-a is affirmative, what was the nature and quantity of the intoxicating beverages consumed by you?
 - (d) Within the eight hours immediately preceding the time of this accident, were drugs of any kind injected or otherwise introduced into your body?
 - (e) If answer to 12-d is affirmative, what type of drug was injected or otherwise introduced into your body?
 - (f) If answer to 12-d is affirmative, at what time or times were the drugs injected or introduced into your body and in what quantities?
13. (a) Were the brakes on the vehicle operated by you in good working order at the time of the accident made the basis of this suit?
- (b) Did you apply the brakes on the vehicle operated by you prior to the collision?
- (c) If answer to 13-b is affirmative, did the application of your brakes cause skid marks to be left on the surface of the street on which you were traveling?
- (d) If answer to 13-b is affirmative, state the speed in miles per hour your vehicle was traveling at the moment the brakes were applied?
- (e) If answer to 13-b is affirmative, how many feet did your vehicle travel from the moment the brakes were applied until the vehicle came to a stop after the occurrence of this accident?
- (f) What action, if any, did you take to avoid striking the vehicle operated by the plaintiff?
14. (a) State specifically what portion of the vehicles involved in this accident first came in contact with each other?

- (b) Describe the portions which next came in contact after the initial impact?
 - (c) What was the distance traveled by each of the vehicles involved in this accident from the point of impact to the point where each of said vehicles first came to stop?
 - (d) In what direction did each of said motor vehicles move from the point of impact until each came to a complete stop?
 - (e) How far did your vehicle travel after impact until it came to rest?
 - (f) Was the vehicle occupied by you overturned as a result of this accident?
 - (g) If answer to 14-f is affirmative, where did the vehicle occupied by you initially overturn with reference to the point of impact?
 - (h) If answer to 14-f is affirmative, in what position did the vehicle occupied by you finally come to rest?
 - (i) If answer to 14-f is affirmative, how many times did the vehicle occupied by you overturn before coming to rest?
 - (j) If answer to 14-f is affirmative, describe the opening of the vehicle occupied by you through which you exited said vehicle?
 - (k) Describe and locate with reference to the point of impact, each and every skid mark which led up to the point of impact?
 - (l) Describe and locate with reference to the point of impact, each and every skid mark which led away from the point of impact?
15. What was the speed of the motor vehicle operated by you at the following points:

- (a) When you were 300 feet from the point of impact?
 - (b) When you were 100 feet from the point of impact?
 - (c) When you were 50 feet from the point of impact?
 - (d) When you were 25 feet from the point of impact?
 - (e) At the time of impact?
 - (f) When you first observed the vehicle operated by the plaintiff?
16. According to your best judgment, what was the speed of plaintiff's vehicle at the following points:
- (a) When you first observed same prior to the accident made the basis of this suit?
 - (b) At a point 150 feet from the point of impact?
 - (c) At a point 75 feet from the point of impact?
 - (d) At a point 50 feet from the point of impact?
 - (e) At a point 25 feet from the point of impact?
 - (f) At a point 10 feet from the point of impact?
 - (g) At the time of impact?
 - (h) Immediately after impact?
17. (a) Was your horn or any other signal given as a warning by the operator of either vehicle involved in this accident prior to the time of the collision?
- (b) If answer to 17-a is affirmative, describe each of said signals given by each respective driver specifically and in detail?
 - (c) If answer to 17-a is affirmative, state how far distant from the point of impact each vehicle was located at the time said signal was given?
 - (d) If any signals for stopping or turning were given by either driver immediately prior to said collision, describe said signal and state how far distant from the point of impact said signal was given?

- (e) Why did you not stop your vehicle before colliding with the vehicle driven by the plaintiff?
18. (a) Aside from the vehicles owned by or operated by the parties to this law suit, were any other motor vehicles in any way involved in the accident made the basis of this suit?
- (b) If answer to 18-a is affirmative, describe in detail the manner in which said other vehicles was involved in this accident?
- (c) If answer to 18-a is affirmative, what is the full name and address of the owner and operator of each other vehicle involved in this accident?
19. (a) Were any photographs taken at the scene of this accident?
- (b) Have you seen any photographs which were taken at the scene of this accident?
- (c) If answer to 19-a or 19-b is affirmative, what is the full name and address of the person who took said photographs?
- (d) If answer to 19-b is affirmative, what is the full name and address of the person who showed you said photographs?
- (e) Were any photographs taken of the vehicle occupied by you after this accident?
- (f) Have you seen any photographs taken of the vehicle occupied by you after this accident?
- (g) If answer to 19-e or 19-f is affirmative, what is the full name and address of the person who took said photographs?
- (h) If answer to 19-e or 19-f is affirmative, what is the full name and address of the person who showed you said photographs?

- (i) Do you know if there are any witnesses to the accident made the basis of this suit other than the occupants of the vehicles involved in the accident, and if so what are their full names and addresses?

LYONS, PIPES AND COOK
Attorneys for Plaintiff

By: Augustine Meaher, III
Augustine Meaher, III

STATE OF ALABAMA
COUNTY OF MOBILE

Personally appeared before me, a Notary Public, in and for said County and State, the undersigned Augustine Meaher, III, having been by me first duly sworn, deposes and says that he is of counsel for the plaintiff and as such has authority to make this affidavit, and that Answers to the foregoing Interrogatories is well and truly made, will be material testimony for the plaintiff upon trial of this cause.

Augustine Meaher, III
Augustine Meaher, III

Sworn and subscribed to before me on this 2nd day of June, 1967.

Bellie Sage Burch
NOTARY PUBLIC

Defendant Edwin Avon Barks may be served at the following address:

Route 1, Box 139
Daphne, Alabama

FILED

JUN 22 1967

JOE L. DICK, CLERK
REGISTERED

7576

Received 23 day of June 1967
and on 27 day of June 1967
I served a copy of the within Inter
on Edwin Arvon Barks

By service on above
Spanish Hat
TAYLOR WILKINS, Sheriff
By Ray Powell D.S.

Sheriff claims 44 miles
Ten Cents per mile Total \$ 4.40
TAYLOR WILKINS, Sheriff
BY RR
DEPUTY SHERIFF

Ronald Lee Ridings
Plf.

vs.

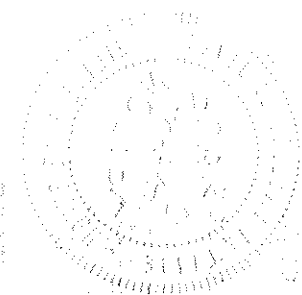
Edwin Arvon Barks
John F. BARK, John F.
Barks, Jr., separately
& Severally
Def.

Interrogatories
serve: Edwin Arvon Barks

FILED

JUN 22 1967

ALICE A. DICK, CLERK



RONALD LEE RIDINGS)	IN THE CIRCUIT COURT OF
)	MOBILE COUNTY BALDWIN COUNTY
Plaintiff)	ALABAMA.
vs.)	AT LAW
EDWIN AVON BARKS, JOHN F. BARKS, JOHN F. BARKS, JR., separately and severally)	CASE NO. 7576
Defendant)	

INTERROGATORIES TO THE PLAINTIFF

Comes now each of the following defendants, separately and severally,
the defendants and, desiring the testimony of the plaintiff, pro-
pounds to the plaintiff the following interrogatories, as is provided under Section 477, et seq., of Title 7
of the CODE OF ALABAMA of 1940, to wit:

1. State your correct name, age, residence address and business address.

2. State the name and address of your employer at the time of the occurrence made the basis of this
suit and the type of work you were doing. (a) State your average weekly earnings at the time of said occur-
rence. (b) State the number of days and the dates of the days you actually lost from work as a result
of the injuries you allege you received. (c) State whether or not you continued to receive wages from
your said employer during the period of your disability as a result of the occurrence made the basis of
this suit. (d) State the amount lost in wages by you as a result of said occurrence. (e) Give the name
and address of your present employer and the type of work you are doing. (f) State the amount of your
present average weekly earnings. (g) Give the name and address of each and every other person by
whom you have been employed since the date of the occurrence made the basis of this suit and your
average weekly wage in each employment. (h) How much gross earnings from your employment did you
report to the Collector of Internal Revenue for income tax purposes for the calendar year immediately prior
to the year of said occurrence? (i) How much gross earnings from your employment did you report to
the Collector of Internal Revenue for income tax purposes for the calendar year during which said occur-
rence happened? (j) How much gross earnings from your employment did you report to the Collector of
Internal Revenue for income tax purposes for the calendar year next subsequent to the year of said occur-
rence?

3. Describe each and every injury received by you in the occurrence made the basis of this suit.
(a) Describe and locate each and every laceration or cut you sustained in said occurrence. (b) Describe
and locate each and every bruise, sprain, strain or contusion you sustained in said occurrence. (c) De-
scribe and locate each and every fracture or dislocation suffered by you in said occurrence. (d) Specify
which, if any, of said injuries are permanent in nature, and state the manner and degree in which each
said injury disables you. (e) Specify and describe in detail any and all other ailments resulting from said
occurrence which have not already been enumerated by you, and state how and to what degree said con-
dition manifests itself.

4. Give the name and address of each and every doctor, if any, who has attended you for the injuries you allege to have received in the occurrence made the basis of this suit. (a) Give the dates of treatment or examination of you by each and every said doctor, respectively. (b) What was your condition with reference to said injuries and ailments when you were first attended by each of said doctors, separately and severally? (c) What was your condition with reference to said injuries and ailments when you were last attended by each of said doctors, separately and severally? (d) State the date on which you were last treated, examined or prescribed for by each of said doctors, separately and severally, and relate in substance what transpired at said time between you and each of said doctors, and include the substance of said doctor's instructions to you with reference to further treatment. (e) State the amount of the bill, separately and severally, of each respective doctor for the treatment rendered you or services performed for you, resulting from the occurrence made the basis of this suit. (f) State which of said doctors, separately, have been paid, and, if so, by whom. (g) State whether you had any form of medical insurance or other protection which took care of said doctors' bills, and, if so, to what extent? (h) Were you referred to any of the doctors heretofore mentioned by you in your answers to these interrogatories by the attorney or attorneys who represent you and, if so, state the name or names of such doctors. (i) Did any of the doctors heretofore mentioned by you refer you to the attorney or attorneys who represent you and, if so, state which of said doctors did so.

5. State whether or not you were hospitalized as a result of the occurrence made the basis of this suit. (a) If so, give the name and address of said hospital where you were confined. (b) Give the dates of your confinement. (c) State the amount of the hospital bill incurred for your confinement. (d) State whether or not any portion of said bill was taken care of by hospitalization insurance or by any other form of protection, and, if so, what portion? (e) State who paid or became obligated to pay said hospital bill or portion thereof.

6. State whether or not any X-rays were taken of you as a result of the occurrence made the basis of this suit. (a) Give the name and address of every radiologist who took said X-rays or who supervised their taking and state when all said X-rays, respectively, were taken. (b) State each X-ray reading or your understanding of what each of the X-rays revealed, respectively. (c) Give the amount of each said X-ray bill, and state by whom each was paid.

7. State whether or not special nurses, registered nurses or practical nurses attended you in the treatment of the injuries you allege you received in the occurrence made the basis of this suit. (a) If so, give the name and address of each. (b) Give the dates you were attended by each of said nurses, separately and severally, and state whether they were special nurses, registered nurses or practical nurses. (c) Give the amount of each of said nurse's bill, separately and severally. (d) State who paid said bills, and also whether your said expenses were taken care of by any form of medical insurance or protection.

8. State whether or not you incurred any ambulance bills, drug expense or miscellaneous expense of any nature whatsoever not already enumerated as a result of the occurrence made the basis of this suit. (a) Describe each of said expenses, separately and severally, stating the amount of each. (b) By whom were each of said expenses paid?

9. State how long you were confined to bed at home after, and as the result of, the occurrence made the basis of this suit, if you were so confined, and state the dates of said confinement. (a) State how many days elapsed from the date of said occurrence until you were able to be out of bed and up and

about your home. (b) State how many days elapsed from the date of the occurrence until you were able to leave your home and come to town or go other places. (c) State the number of days which elapsed from the date of said occurrence before you were able to resume your normal activities.

10. State whether or not, prior to the occurrence made the basis of this suit, you were ever at any time injured in any manner whatsoever to any extent. (a) If you were injured prior to the occurrence made the basis of this suit in any manner, please describe in detail how you were injured, giving the date of each such injury and the extent of each such injury. (b) Have you sustained any injuries of any nature whatsoever subsequently to the occurrence made the basis of this suit? (c) If so, describe the same fully and in detail. (d) Have you ever made claim or filed suit for any injury or damage arising out of any occurrence prior to the accident made the basis of this suit? (e) If so, state where each such occurrence happened, against whom each such claim was made and the outcome of each. (f) Give the name and address of each and every doctor who has treated or examined you during the five years next preceding the date of the occurrence made the basis of this suit. (g) Describe the condition for which you were so treated or examined.

11. Describe completely and in detail the vehicle involved in, and occupied, driven by or owned by you on the occasion of the accident made the basis of this suit, stating in your answer the make, year, model and body style of the same. (a) State the name and address of the owner of said motor vehicle on the date of said accident. (b) State the name and address of the driver of said vehicle on said occasion. (c) State by whom said motor vehicle had been purchased prior to said accident, and give the date of the purchase. (d) How much was paid for said motor vehicle at the time of said purchase? (e) Give the name and address of any other person who had any interest of any nature whatsoever in said motor vehicle at the time of said accident and describe that interest.

12. Describe completely and in detail every item of damage sustained by said motor vehicle on the occasion of said accident. State in your opinion the fair reasonable market value of said motor vehicle immediately prior to said accident and also immediately after said accident, before it was repaired. (a) Give the amount of each repair estimate obtained as to said damage, and give the name and address of the person or company making said repair estimate. (b) 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 that made said repairs. (c) State who paid for said repairs. (d) State how long the motor vehicle was in the repair shop. (e) State whether or not you have made any sworn statement as to the amount of the damage to said motor vehicle. (f) If so, give the name and address of the person or company to whom said sworn statement was made, when it was made and the amount that was stated in same. (g) State whether or not said motor vehicle has been sold subsequently to the date of the accident made the basis of this suit, and, if so, for what amount, and state the name and address of the person, firm or corporation to which said vehicle was sold. (h) Give the mileage reading of said motor vehicle at the time of the accident made the basis of this suit. (i) Give the mileage reading of said motor vehicle at the time of answering these interrogatories. (j) Describe the condition of the brakes, signal device, steering apparatus, tires and lighting equipment on said motor vehicle, separately, at the time of the accident made the basis of this suit. (k) When had the brakes, signal device, steering apparatus, lights and tires on said motor vehicle, separately, last been inspected prior to said accident, and by whom?

13. State the number of persons occupying the motor vehicle in or on which you also were riding or which you were driving at the time of the accident made the basis of this suit, and state specifically how and in what manner said occupants were located in or on said vehicle on said occasion. Give their names and addresses. (a) State fully the purpose of the trip you were making at the time of the accident made the basis of this suit. (b) From what point had you departed? (c) What was your destination? (d) Were you performing a mission, errand or duty for anybody whomsoever? If so, state the nature of same and the name and address of the person or company for whom you were performing it. (e) Give the name and address of each and every company or person who had any interest whatsoever in the trip you were making at said time, the nature of said interest and the connection of said company or person with the trip. (f) If you were not an occupant of the vehicle involved in said accident, but owned it, state the purpose of trip on which it was engaged and whether same was in connection with your business or for your benefit.

14. Prepare and attach to your answers to these interrogatories a sketch portraying the scene of the accident and the physical objects involved in the accident made the basis of this suit, and designate on said sketch, giving your best judgment as to distances, the following: (a) The point of impact and skid marks leading up to and from same. (b) The resting places of the vehicles and of any pedestrian after the accident. (c) Where you were located when you first saw the defendant's vehicle or other vehicle involved in the accident. (d) Where the defendant's or other 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.

15. 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 then 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 then see to the left and right on each of the streets entering the intersection and down each of the intersecting streets when you approached at a point 50 feet from said intersection immediately prior to said accident. (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 200 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.

16. State where the motor vehicle allegedly operated by or on behalf of the defendant (hereinafter sometimes called defendant's motor vehicle) was located with reference to the point of impact in the accident made the basis of this suit when you first observed same immediately prior to said accident. (a) Did you see the defendant's motor vehicle before the actual collision? (b) How many feet was the defendant's motor vehicle from the place of the impact when you first observed same? (c) How many feet were you from the place of impact when you first observed the defendant's motor vehicle? (d) Where was the defendant's motor vehicle when you first entered the intersection with reference to the place of impact? (e) Where was the defendant's motor vehicle with reference to the intersection when you first entered same? (f) Describe the condition of all automatic traffic signal lights located in the intersection at the time each of said motor vehicles entered same on the occasion of the accident made the basis of this suit, stating the condition, if you know, of the color of the light which was facing the approaching driver. (g) Where did the impact occur with reference to the center line of the street on which defendant's motor vehicle was traveling? (h) Where did the impact occur with reference to the right edge of the street on which defendant's motor vehicle was traveling? (i) How far distant were you from the nearest intersection when the impact occurred?

17. 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 the same as seen by you. (a) If you were a passenger in a vehicle involved in this accident, describe each and everything done by the operator of the said vehicle in which you were riding to avoid said accident. (b) Describe each and everything which the driver of the defendant's motor vehicle failed to do to avoid said accident. (c) Describe each and everything done by the driver of defendant's motor vehicle immediately prior to and at the time of said accident. (d) State each and everything done by you immediately prior to said accident.

18. State whether or not any of the operators of any of the vehicles involved in the accident made the basis of this suit were intoxicated, in your opinion, or were drinking intoxicating beverages at the time of the said accident. (a) Give the name and address of each of said operators who was drinking or who was intoxicated. (b) State what each of said persons was or had been drinking, where he or she had obtained same, the quantity or amount consumed and the time and place where same was drunk. (c) If you were an occupant of a vehicle involved in the accident made the basis of this suit, state whether either you or the driver of the vehicle (if different persons) in which you were riding pleaded guilty to a charge of reckless driving or of driving while intoxicated arising from said accident. If so, when and in what court was this done?

19. State, according to your best judgment, the speed of the defendant's motor vehicle 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 impact. (i) Immediately after the impact.

20. State in what direction and along what street or highway each of the motor vehicles involved in the accident made the basis of this suit was traveling on the occasion of said accident. (a) State in your best judgment, in number of feet, the width of each of said streets or highways. (b) If any 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. (c) If you were a passenger, then state at what point had the motor vehicle in which you were riding entered the street upon which you were traveling at the time of the said accident? (d) If you were a pedestrian, state from which corner you had started to cross the street, or if you were crossing at a point not in a cross-walk, state from where you started. (e) If you were a pedestrian, describe each and every precaution taken by you, if any, before attempting to cross the street. (f) If you were a pedestrian, state whether you were crossing the street at a point between intersections.

21. State fully, specifically and in detail each and every act or thing done by the operator of the vehicle occupied or driven 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. (a) Describe each change in the course of travel

made by the defendant's motor vehicle immediately prior to said accident. (b) Describe each change in the course of travel made by the vehicle in which you were immediately prior to said accident.

22. State whether or not the brakes on the vehicle occupied by you or driven by you at the time of said accident were applied prior to the collision. (a) If so, state in your best judgment the speed in miles per hour said vehicle was traveling at the moment the brakes were applied. (b) 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. (c) 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.

23. State specifically what portion of the vehicles involved in the accident made the basis of this suit first came in contact with each other. (a) Describe the portions which next came in contact after the initial impact. (b) If you were a pedestrian, describe what portion of the defendant's vehicle struck you and where on your body you were struck.

24. 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. (a) In what direction did each of said motor vehicles move from the point of said collision until they came to a complete stop? (b) Describe each and every skid mark which led up to the point of collision. (c) Describe each and every skid mark which extended from the point of the collision toward the place where either or both of the motor vehicles involved in the accident came to rest. (d) Locate the point where each motor vehicle came to rest with reference to the point of the impact, the center of the intersection, the four corners of same and the right edge of the street on which it had been traveling.

25. State the speed of the motor vehicle which you were driving or in which you were riding, 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 point of impact. (g) At the time of said impact. (h) When you first observed the other vehicle involved in said accident.

26. State whether any horn was sounded or any other signal was given as a warning by the operator of any of the vehicles involved in the accident made the basis of this suit prior to the time of the collision. (a) If so, describe each of said signals given by each respective driver specifically and in detail. (b) State how far distant from the point of collision each vehicle was located at the time each said signal was given, respectively. (c) If any signals for stopping or turning were given by any driver immediately prior to said collision, describe same, and state how far distant from the point of impact each said signal was given by each driver, respectively.

27. 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. (a) 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. (b) 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. (c) Give the name and address of each driver and owner of each of said vehicles, as fully as you can.

28. Did you make any statement or statements concerning said accident 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? (a) If so, state when, where and what, in substance, was said by you. (b) Did the driver of the defendant's motor vehicle make any statement in your presence concerning the accident following the occurrence of the accident, and, if so, state when, where and what, in substance, was said by said driver. (c) Did the operator of the vehicle in which you were riding at the time of said occurrence make any statement concerning the accident following the same? (d) If so, state when, where and what, in substance, was said. (e) Give the name and address of each and every person who was present when any and all of said statements, respectively, were made either by you, the driver of the vehicle in which you were riding or by the driver of the defendant's motor vehicle following the occurrence of the accident made the basis of this suit, and further identify each such person as to what statement was made in his or her presence.

HAND, ARENDALL, BEDSOLE, GREAVES AND JOHNSTON

By:



Attorneys for Defendant

THE STATE OF ALABAMA:

COUNTY OF MOBILE :

Before me, the undersigned authority in and for said county in said state, this day personally appeared Louis E. Braswell, who is known to me, and who, being by me first duly sworn, upon oath deposes and says that he is one of the attorneys for said specified defendant in the above entitled cause, and as such is authorized to make this affidavit; that the answers of the plaintiff to the foregoing interrogatories, when well and truly made and filed, will be material testimony for said defendant on the trial of this cause.

Louis E. Braswell

Sworn to and subscribed before me on
this 10th day of July
1967.



Carolyn L. McKissack
Notary Public

My Commission Expires May 10, 1970

FILED
JUL 11 1967

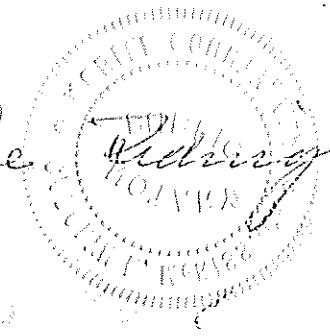
ALICE J. DUCK, CLERK
REGISTER

Plaintiff may be served by serving his attorney
Norborne C. Stone, Esq., at his office.

Service accepted this 11th day of July, 1967
Norborne C. Stone
Attorney for Plaintiff

no. 7576

Ronald Lee *Widrig*



vs.

Edwin Aron Barker et al

Interrogatories

to be served on McStone, et al.

RONALD LEE RIDINGS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
EDWIN AVON BRAKS, JOHN F.)	
BARKS, JOHN F. BARKS, JR.,)	
separate and severally,)	
Defendants.)	CASE NO. 7576
)	

ANSWERS TO INTERROGATORIES

COMES NOW Ronald Lee Ridings and for Answer to the defendants' Interrogatories heretofore propounded to him says as follows:

1. My name is Ronald Lee Ridings. Age 24. I reside at 1550 Azalea Road, and I work at Scott Paper Company in Mobile.
2. Scott Paper Company. Warehouse truck driver.
 - A. Approximately \$114.00 per week plus over time and differential earnings.
 - B. I returned to work on Saturday, October 15, 1966. October 11 and October 12 were my off days.
 - C. No.
 - D. \$45.44 plus over time, differential pay and undetermined future earnings.
 - E. Scott Paper Company. Warehouse truck driver.
 - F. Approximately \$120.00 plus over time and differential pay; my injuries impair my ability to perform over time work.
 - G. None.
 - H. On advice of counsel I respectfully decline to answer the question on the grounds that it is irrelevant, immaterial and incompetent.
 - I. \$7,304.42.
 - J. No tax report filed for 1967 at the present time.

3. I was sick and sore and was cut and bruised on my left elbow, left arm, left hand, left leg, left ankle, left foot, right hand, right arm, right knee, and was bruised throughout my chest. I suffered great physical pain and mental anguish.
- A. See 3.
 - B. See 3.
 - C. None to my knowledge.
 - D. Left elbow is scarred and throbs during exertion at my job. I am not a physician and cannot specify the degree which the injuries disable me.
 - E. I have a nervous twitch in my left shoulder, and fragments of glass work their way out of my left arm.
4. I was attended by a doctor in the Emergency Room of Mobile General Hospital whose name is unknown to me.
- A. I was treated by the doctor in Mobile General on October 11, 1966.
 - B. I was bruised and bleeding profusely.
 - C. Not Applicable.
 - D. On October 11 the doctor at Mobile General Hospital and the Emergency Room attendants cleansed my injuries, bandaged my injuries and put stitches in my left elbow, The doctor prescribed pills whose ingredients are unknown to me, instructed the bandages to be changed twice or three times daily as often as needed, and the stitches to be removed in a week or ten days.
 - E. To the best of my knowledge the hospital expenses were as follows:
 - \$15.00 Mobile General Hospital
 - \$25.00 Ambulance
 - \$ 5.00 Emergency Room

F. None.

G. On the advice of counsel I respectfully decline to answer the question on the following separate and several grounds:

1. The question is irrelevant, immaterial and incompetent,
2. The question calls for information which would not be admissible at the trial of this cause,
3. The question calls for information beyond the scope of this law suit,
4. The question raises a subject which is prejudicial to the plaintiff's presentation of his case.

H. No.

I. No.

5. No, I was treated in the Emergency Room of the Mobile General Hospital on October 11, 1966.

A. See 5.

B. See 5.

C. See 4 (E).

D. On the advice of counsel I respectfully decline to answer the question on the following separate and several grounds:

1. The question is irrelevant, immaterial and incompetent,
2. The question calls for information which would not be admissible at the trial of this cause,
3. The question calls for information beyond the scope of this law suit,
4. The question raises a subject which is prejudicial to the plaintiff's presentation of his case.

E. I became obligated to pay my hospital expenses.

6. None to my knowledge.

A. See 6.

B. See 6.

C. See 6.

7. Yes

A. Nurses in the Mobile General Hospital and First Aid Infirmary at Scott Paper Company whose names and addresses are unknown to me.

B. I do not understand the distinction between special nurses, registered nurses or practical nurses.

C. I was attended by the nurses at the Emergency Room of the Mobile General on October 11, 1966. I was attended by the nurses at Scott Paper Company on various occasions between October 17 and October 20.

D. On the advice of counsel I respectfully decline to answer the question on the following separate and several grounds:

1. The question is irrelevant, immaterial and incompetent,

2. The question calls for information which would not be admissible at the trial of this cause,

3. The question calls for information beyond the scope of this law suit.

4. The question raises a subject which is prejudicial to the plaintiff's presentation of his case.

8. Same as 4 (E). I also paid approximately \$7.50 for prescriptions and bandages.

9. Three days, October 12-14.
 - A. I was up and about with limited movement on October 15.
 - B. I left home on October 15 and returned to work.
 - C. Approximately two weeks.
10. On the advice of counsel I respectfully decline to answer the question on the following grounds, separately and severally:
 1. The question is irrelevant, immaterial and incompetent,
 2. The question is incapable of being answered,
 3. The question is not limited to the time and scope of the matters involved in this case,
 4. The question calls for plaintiff to recall even injuries received in infancy which have long since healed and are not involved in this case.
 5. For that the clause "you were ever at anytime injured in any manner whatsoever to any extent" is so vague as to be unintelligible.
 6. The question places an unreasonable burden on the plaintiff.
 7. The question is too general.
 - A. Not Applicable.
 - B. Yes.
 - C. I got a fish hook in my finger.
 - D. No.
 - E. Not Applicable.
 - F. I underwent physical examinations approximately six times by various United States Air Force doctors whose names are unknown to me. A Scott Paper Company physician in the course of my employment whose name is unknown to me.

G. See 10 (F).

11. 1966 Volkswagon, two door.

A. Ronald Lee Ridings. 1550 Azalea Road, Mobile, Alabama.

B. Same as 11 (A).

C. I purchased the automobile in approximately November of 1965 from Continental Motors, Inc.

D. The total price was \$1,909.05 but I did not pay cash for the automobile. It was financed through GFC and Continental Motors in Mobile, Alabama.

E. See 11 (D).

12. The entire left side was damaged and front end.

\$1,600.00 before and \$500.00 afterwards.

A. The vehicle was repaired by Continental Volkswagon for \$848.97 and I do not know if any other estimates were made.

B. See 12 (A).

C. On advice of counsel I respectfully decline to answer the question on the following grounds, separately and severally:

1. It is irrelevant, immaterial and incompetent,
2. It calls for information which would not be admissable at the trial of this case.

D. Approximately two weeks.

E. Yes.

F. In my answers to the Interrogatories propounded by defendants as appears more fully in my said Answers.

G. No.

H. Approximately 20,000 miles.

I. Approximately 35,800 miles.

J. The brakes, signal device, steering apparatus, tires and lighting equipment were in good working order.

K. September, 1966 by Continental Motors, Inc.

13. I was seated in the driver's seat and Judy Virginia Rodgers Ridings was seated in the right front seat. We both reside at 1550 Azalea Road, Mobile, Alabama.
- A. We were looking for a site on which to put our house trailer.
 - B. From Grand View Trailer Park on Dauphin Island Parkway.
 - C. We were just looking.
 - D. No.
 - E. See 13 (D).
 - F. Not Applicable.
14. I am not a draftsman.
15. A. The accident occurred at the intersection of U.S. Highway 98 and Old U.S. Highway 98 about one-half mile South of D'Olive Creek.
- B. Not to my knowledge.
 - C. Approximately 150 feet to the left; there was no intersecting road immediately to the right.
 - D. On the advice of counsel I respectfully decline to answer on the grounds that it calls for information within the knowledge of the plaintiff.
 - E. There was no traffic signals at this intersection.
16. The defendant had struck my vehicle when I first observed him.
- A. Not to my knowledge.
 - B. See 16.
 - C. See 16.
 - D. I do not know.
 - E. I do not know.
 - F. See 15 (E).
 - G. Impact occurred slightly to the West of the center line of U.S. Highway 98.

- H. Impact occurred slightly more than half way across the road on which defendant's motor vehicle was travelling.
 - I. I was at the intersection at the time of impact.
17. I was giving a left turn signal and was in the process of making a left turn when the plaintiff's vehicle overtook my car at a high rate of speed and passed me on the left.
- A. Not Applicable.
 - B. He failed to travel at a safe speed, failed to make sure that the way was clear before attempting to pass my vehicle and failed to sound his horn before passing.
 - C. On the advice of counsel I respectfully decline to answer on the grounds that it calls for information within the knowledge of the plaintiff.
 - D. See 17.
18. No.
- A. Not Applicable.
 - B. Not Applicable.
 - C. No.
19. I first observed the plaintiff at the time of impact.
- A. See 19.
 - B. See 19.
 - C. See 19.
 - D. See 19.
 - E. See 19.
 - F. See 19.
 - G. See 19.
 - H. See 19.
 - I. Approximately 75 miles per hour.

20. Both vehicles were travelling Northwardly on U.S. Highway 98.
- A. About 20 feet.
 - B. See 17 and also see 21.
 - C. Not Applicable.
 - D. Not Applicable.
 - E. Not Applicable.
 - F. Not Applicable.
21. I began my left mechanical turn signal immediately North of the intersection of Windsor Drive and slowly approached the intersection of Old Highway 98; as I was making my left turn the plaintiff struck my vehicle.
- A. I do not know.
 - B. See 21 and also see 17.
22. No.
- A. Not Applicable.
 - B. Not Applicable.
 - C. Not Applicable.
23. The right front of plaintiff's vehicle struck the left rear of my car.
- A. The right side of the plaintiff's vehicle careened along the left side of my vehicle.
 - B. Not Applicable.
24. My vehicle was knocked approximately 30 feet and plaintiff's vehicle travelled approximately 100 yards after impact.
- A. My vehicle was spun in a southerly direction and the defendant's vehicle travelled generally northward.
 - B. I did not pay any attention to skid marks if any.
 - C. See 24 (B).
 - D. See 24, 24 (A) and also see 16 (G).

25. A. Approximately 20 miles per hour.
B. Approximately 20 miles per hour.
C. Approximately 20 miles per hour.
D. Approximately 20 miles per hour.
E. Approximately 20 miles per hour.
F. About 10-15 miles per hour.
G. About 10-15 miles per hour.
H. About 10-15 miles per hour.
26. I gave a left turn mechanical signal.
A. See 26.
B. I began my left turn signal more than 100 feet from the point of impact.
C. I do not know the location of the plaintiff's vehicle at the time I first gave my turn signal but I was at least 100 feet from the point of impact.
27. I saw a milk truck travelling on Highway 98 at the scene of the accident.
A. I saw only one vehicle and I do not know where it was located at the time of impact. The milk truck was not involved in the collision.
B. No.
C. I do not know the names and addresses of the driver and owner of the milk truck.
28. The driver of the plaintiff's vehicle asked me why I did not get out of his way. I asked him if he had seen my left turn signal.
A. See 28.
B. See 28.
C. See 28.
D. See 28.

E. Judy Virginia Rodgers Ridings. 1550 Azalea
Road, Mobile, Alabama.

Ronald Lee Ridings
RONALD LEE RIDINGS

STATE OF ALABAMA

COUNTY OF MOBILE

Personally appeared before me, the undersigned authority,
Ronald Lee Ridings, who first duly sworn, deposes and says
that the foregoing Answers to the Interrogatories heretofore
propounded to him are true and correct.

Ronald Lee Ridings
RONALD LEE RIDINGS

Sworn to and subscribed before me this 17 day of August,
1967.

Bessie Faye Bunch
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing
pleading has been served upon counsel
for all parties to this proceeding, by
mailing the same to each by First Class
United States Mail, properly addressed
and postage prepaid on this 23 day
of August, 1967.

M. J. Stone

FILED

AUG 23 1967

ALICE J. DUCK

CLERK
REGISTER

RONALD LEE RIDINGS, :
Plaintiff : IN THE CIRCUIT COURT OF
vs. : BALDWIN COUNTY, ALABAMA
EDWIN AVON BARKS, :
JOHN F. BARKS, JOHN F. : AT LAW
BARKS, JR., separately :
and severally, :
Defendants. : CASE NO. 7576

FILED
JUL 28 1967

ALICE L. BARKS, CLERK

ANSWERS TO INTERROGATORIES

Comes now the defendant Edwin Avon Barks and for answer to the interrogatories heretofore propounded by the plaintiff says as follows:

1. (a) Edwin Avon Barks.
(b) Route 1, Box 139, Daphne, Alabama.
(c) Route 1, Box 139, Daphne, Alabama.
2. (a) Yes.
3. (a) No.
(b) John Franklin Barks, Sr.
4. (a) For transportation to and from Fairhope High School.
(b) John Franklin Barks, Sr.
(c) On or about August 30, 1966.
(d) For my use as transportation to and from Fairhope High School.
5. (a) Yes.
(b) Danny Sharpless, Route 1, Box 312, Daphne, Alabama.

Frank Busby, Route 1, Daphne, Alabama.

Victor Havel, 502 Liberty Street, Fairhope, Alabama.

Johnny Johnson, Route 1, Box 316, Daphne, Alabama.

- (c) After school hours, Fairhope High School
Fairhope, Alabama.
 - (d) Sharpless, Busby, and Johnson to go home;
Havel to go to work at T G & Y at Spanish
Fort, Alabama.
 - (e) No specified time, just driving time from
school to their destination.
6. (a) 1960 Ford, two-door hard top, Galaxie 500.
- (b) Right front, right side, right rear, rear,
left front, left side, top, rear glass and
two rear windows out.
- (c) Everything in good condition.
- (d) All items checked thoroughly at time of
purchase of car on or about August 30,
1966. All were checked by John F. Barks,
Sr., John F. Barks, Jr., and Edwin Avon
Barks.
7. (a) For transportation to and from Fairhope
High School.
- (b) Fairhope High School; left after school,
about 3:00 p.m.
- (c) Home.
- (d) None; just taking the boys home.
- (e) No set time.

8.
 - (a) Approximately, yes.
 - (c) U. S. Highway 98, generally northbound.
 - (d) U. S. Highway 98, generally northbound to turn generally West.
 - (e) No.
 - (f) Yes.
 - (g) Yes.
 - (h) Stop sign was not for me; it was for plaintiff.
9.
 - (a) Yes.
 - (b) Vehicle operated by Ridings was stopped at east entrance to U. S. 98 at Lake Forest.
 - (c) Unknown.
 - (d) Unknown.
10.
 - (a) I was going North and from the crest of a hill South of the east entrance to Lake Forest, I saw the Ridings vehicle stopped for the stop sign. My car went down the hill, then up the next hill. When I reached the crest of that hill I saw the Ridings vehicle still stopped in the same place. I continued forward, then the Ridings vehicle moved from the stop sign, turned North in front of me. We were close enough for me to go around. Then the Ridings made a left turn in front of me just as the front of my car was near the rear of his. He gave no signal.
 - (b) He should not have entered the main highway in front of me and made the left turn in the same motion.

- (c) He created a hazard by getting in front of me from the stop sign and then did not give a signal to show he meant to turn. He undoubtedly did not look in his rear view mirror to check for traffic. He did not keep a proper lookout.
 - (d) I did everything I could.
 - (e) The Ridings failed to make a proper check to see if the way was clear to enter the main road and then to make the turn in the manner that he did. He was not looking in his mirror.
11. (a) Already answered.
- (b) I changed lanes to pass.
 - (c) It was headed East at stop sign, turned North, then he suddenly turned to the West.
 - (d) I was in the Southbound lane of U. S. Highway 98 when the impact occurred.
 - (e) Yes.
 - (f) About 100 feet.
 - (g) About 55 miles per hour.
 - (h) Already answered.
12. (a) No.
- (d) No.
13. (a) Yes.
- (b) Yes.
 - (c) No.

- (d) About 55 miles per hour.
 - (e) About 190 feet.
 - (f) Already answered.
14. (a) My right front^{side} came in contact with the
Ridings left front^{side}
- (b) My right side and Ridings' left side.
 - (c) My car about 190 feet; Ridings' car about
20 feet.
 - (d) My car Northwest; Ridings' North.
 - (e) Already answered.
 - (f) Yes.
 - (g) About 60 feet.
 - (h) Resting on its four wheels, front end
facing East.
 - (i) One time.
 - (j) ^{I THINK I}Opened the left front door, which was the
driver's side, ^{BUT I'M NOT SURE.}
 - (k) No skidmarks up to the point of impact.
 - (l) There were about 30 feet of skidmarks left ^{ON THE}
^{LOOSE GRAVEL}
by my car extending from impact, Northwest
to the shoulder of the road. From there my
car was off the paved portion.
15. (a) About 55 miles per hour.
- (b) About 55 miles per hour.
 - (c) About 55 miles per hour.
 - (d) About 55 miles per hour.
 - (e) About 55 miles per hour.
 - (f) About 55 miles per hour.

16. (a) Stopped due to a stop sign.
(b) Just started to move his car; speed slow.
(c) Not over 10 miles per hour.
(d) About 15 miles per hour.
(e) About 15 miles per hour.
(f) About 15 miles per hour.
(g) About 15 miles per hour.
(h) Almost sitting still.
17. (a) No.
(e) Irrelevant, incompetent and immaterial.
18. (a) No.
19. (a) No.
(b) No.
(e) Irrelevant, incompetent and immaterial.
(i) No.

Edwin Avon Barks
Edwin Avon Barks

STATE OF ALABAMA:
COUNTY OF Baldwin:


Before me, the undersigned authority in and for said County in said State, personally appeared Edwin Avon Barks, who being by me first duly sworn, doth depose and say that the foregoing answers to interrogatories are true and correct.

Edwin Avon Barks
Edwin Avon Barks

Subscribed and sworn to before me on this

24th day of July, 1967.

Rosalee Clark
NOTARY PUBLIC, Baldwin COUNTY, ALABAMA



Attorney for Defendant
First National Bank Building
Mobile, Alabama

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES AND JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing answers to interrogatories to Norborne C. Stone, Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office on this the 26 day of July, 1967.



HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:
P. O. BOX 123

CABLE ADDRESS:
HAB

TELEPHONE:
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREYARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS MINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. MCDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH

July 26, 1967

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


Re: Ridings vs. Barks
Case No. 7576

Dear Mrs. Duck:

Enclosed is the original of the answers of the defendant Edwin Avon Barks to the interrogatories propounded to him by the plaintiff. Please file this appropriately.

With the carbon copy of this letter I am sending a copy of the answers to interrogatories to Mr. Stone who represents the plaintiff.

Yours very truly,


For the Firm

LEB.mhb

cc: Norborne C. Stone, Esq.

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

July 7, 1967

MAILING ADDRESS:
P. O. BOX 123

CABLE ADDRESS:
HAB

TELEPHONE:
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
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HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. MCDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH

Alice J. Duck
Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

Re: Ridings vs. Barks
Case No. 7576
Our File: DFP 7964

Dear Mrs. Duck:

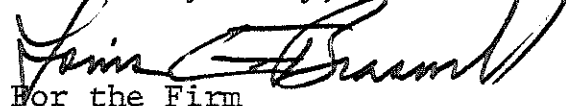
Enclosed is the answer of the three defendants in the above case. Please file these appropriately.

Also enclosed are the original and a copy of some interrogatories which the defendants are propounding to the plaintiff. Please have a copy served upon Mr. Stone, who is attorney for the plaintiff.

Please indicate your receipt of these papers on the enclosed carbon copy of this letter and return the carbon copy to me.

Thanks very much.

Yours very truly,

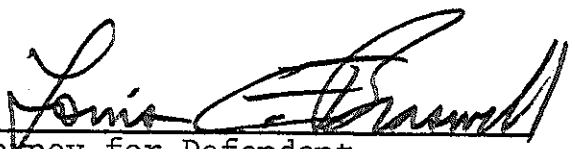

For the Firm

LEB.mhb
Enclosures

RONALD LEE RIDINGS,	:	IN THE CIRCUIT COURT OF
	:	
Plaintiff	:	BALDWIN COUNTY, ALABAMA
	:	
vs.	:	
	:	
EDWIN AVON BARKS,	:	AT LAW
JOHN F. BARKS, JOHN F.	:	
BARKS, JR., separately	:	
and severally,	:	
	:	
Defendants.	:	CASE NO. 7576

M O T I O N

Comes now the defendant John F. Barks, separately and severally, and moves the Court to appoint a guardian ad litem for the plaintiff, and in support of this motion this defendant avers, on information and belief, that the plaintiff is a minor.

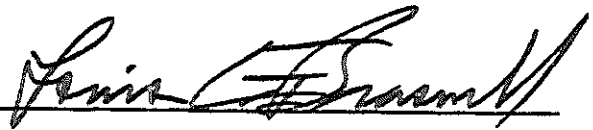

 Attorney for Defendant
 John F. Barks
 First National Bank Building
 Mobile, Alabama

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES AND JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing motion to Norborne C. Stone, Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office on this the 1 day of August, 1967.



FILED

AUG 2 1967

MADE J. DICK, CLERK
REGISTER

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
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HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH

MAILING ADDRESS:
P. O. BOX 123

CABLE ADDRESS:
HAB

TELEPHONE:
432-5511
AREA CODE 205

August 1, 1967

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

Re: Ridings vs. Barks
Case No. 7576
Our File: LEB 7964

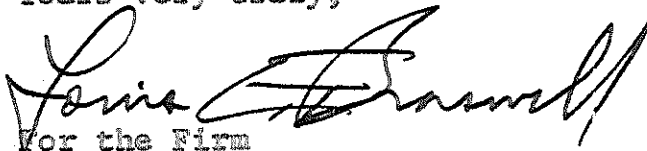
Dear Mrs. Duck:

Enclosed is an amended answer (containing pleas of recoupment) of John F. Barks to be filed appropriately in connection with the above case.

Also enclosed is a motion for the Court to appoint a guardian ad litem for the minor plaintiff.

Please indicate your receipt of these papers on the enclosed carbon copy of this letter and then return the copy to me for my file.

Yours very truly,


For the Firm

LEB.mhb
Enclosure

RONALD LEE RIDINGS,	X		
Plaintiff,	X	IN THE CIRCUIT COURT OF	
	X		
vs.	X	BALDWIN COUNTY, ALABAMA	
	X	AT LAW	NO. 7576
EDWIN AVON BARKS,	X		
et al.,	X		
Defendants.	X		

ORDER GRANTING MOTION TO APPOINT
GUARDIAN AD LITEM

The Plaintiff in the above styled cause having heretofore filed a Motion to have a Guardian ad Litem appointed to represent and protect the interest of the Defendant, Edwin Avon Barks, and the same having been called to the attention of the Court and the Court having considered the same and it appearing to the Court that said Defendant is a minor; it is, therefore

ORDERED and DECREED by the Court that said Motion be, and the same is hereby, granted.

It is further ORDERED and DECREED by the Court that Louis E. Bradwell, Esquire, a practicing attorney of the Alabama Bar be, and he is hereby, appointed as Guardian ad Litem for the Defendant, Edwin Avon Barks, in this cause.

10th December, 1968.
Done this 10th day of March, 1968.

J. J. M. M. M. M. M.
Circuit Judge

Filed 12-10-68
Miss F. M. M.
Clerk

RONALD LEE RIDINGS,	:	IN THE CIRCUIT COURT OF
	:	
Plaintiff	:	BALDWIN COUNTY, ALABAMA
	:	
vs.	:	
	:	
EDWIN AVON BARKS,	:	
JOHN F. BARKS, JOHN F.	:	AT LAW
BARKS, JR., separately	:	
and severally,	:	
	:	
Defendants.	:	CASE NO. 7576


A N S W E R

Comes now each of the separate and several defendants in the above-styled cause, separately and severally, and for answer to each separate and several count of the complaint filed herein, assigns the following separate and several pleas, separately and severally:

1. Not guilty.
2. The material allegations thereof are untrue.
3. At the time and place described in said count, plaintiff himself so negligently operated a motor vehicle as to contribute proximately and directly to the collision and to the injuries and damages described in said count.



Defendants demand a trial by jury.


 Attorney for Defendants
 First National Bank Building
 Mobile, Alabama

FILED
 JUL 11 1967

ALICE L. DICK, CLERK
 REGISTER

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES AND JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to Norborne C. Stone, Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Baldwin County, Alabama on this, the 10 day of July, 1967.

Lenie E. Brown

RONALD LEE RIDINGS,	X	
		IN THE CIRCUIT COURT OF
Plaintiff,	X	
		BALDWIN COUNTY, ALABAMA
vs.	X	
		AT LAW
EDWIN AVON BARKS, et. al.,	X	
		CASE NO. 7576
Defendants.	X	

REPLICATION

Comes now the Plaintiff in the above styled cause and for answer to pleas "4" and "5" heretofore filed by the Defendant John F. Barks, separately and severally, says as follows:

1. Not guilty.

LYONS, PIPES & COOK

and

CHASON, STONE & CHASON

By: 
Attorneys for Plaintiff

Filed 10-12-68
Rec'd of Clerk
ccw

RONALD LEE RIDINGS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	
)	AT LAW
EDWIN Aeon BARKS,)	
JOHN F. BARKS, JOHN F.)	
BARKS, JR., separately)	
and severally,)	
Defendants.)	CASE NO. 7576

STATE OF ALABAMA
COUNTY OF MOBILE

Personally appeared before me, the undersigned authority in and for said state and county, Augustine Meaher, III, who being first duly sworn depose and say:

That he is one of the attorneys of record for the plaintiff in the above entitled cause, and that Guy Terry Holder, witness for the plaintiff resides at Birmingham, Alabama, which is more than one hundred miles from the City of Bay Minette, Alabama, computed by the route usually travelled, that his personal attendance is necessary to a proper decision of this cause, and that his deposition would be insufficient for that purpose.

Augustine Meaher III
Augustine Meaher, III

Subscribed and sworn to before me this
the 29th day of November, 1968.

Barbara Nicholson
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

FILED

DEC 2 1968

ALICE J. DUCK CLERK
REGISTER

RONALD LEE RIDINGS,	X	
		IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
EDWIN AVON BARKS,	X	
JOHN F. BARKS, JOHN F.		AT LAW
BARKS, JR., separately	X	
and severally,		
	X	CASE NO. 7576
Defendants.	X	

MOTION:

Comes now the Plaintiff in the above styled cause, by his attorneys, and moves this Honorable Court to appoint a guardian ad litem to represent and protect the interest of the Defendant Edwin Avon Barks, one of the Defendants in this cause, and in support thereof respectfully represents and shows unto the Court as follows:

That the Defendant Edwin Avon Barks is a minor.

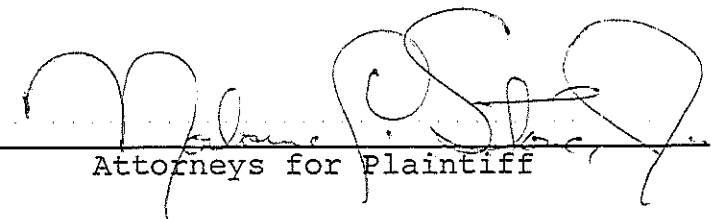
Respectfully submitted,

LYONS, PIPES & COOK

and

CHASON, STONE & CHASON

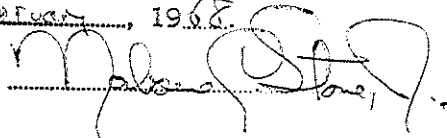
BY:


Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 20th day

of February, 1968.



FILED

FEB 20 1968

ALICE J. DICK

CLERK
REGISTER

RONALD LEE RIDINGS,	X	
		IN THE CIRCUIT COURT OF
Plaintiff,	X	
		BALDWIN COUNTY, ALABAMA
vs.	X	
		AT LAW
EDWIN AVON BARKS, et. al.,	X	
		CASE NO. 7576
Defendants.	X	

AMENDMENT TO COMPLAINT

Comes now the Plaintiff in the above styled cause, by his attorneys, and amends the Complaint heretofore filed in this cause by striking as a party Defendant John F. Barks, Jr.

LYONS, PIPES & COOK

and

CHASON, STONE & CHASON

By: _____

Attorneys for Plaintiff

Filed 12-10-68
Wingfield
clerk

RONALD LEE RIDINGS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	
)	AT LAW
EDWIN AVON BARKS,)	
JOHN F. BARKS, JOHN F.)	
BARKS, JR., separately)	
and severally,)	
Defendants.)	CASE NO. 7576

STATE OF ALABAMA

COUNTY OF MOBILE

Personally appeared before me, the undersigned authority in and for said state and county, Augustine Meaher, III, who being first duly sworn depose and say:

That he is one of the attorneys of record for the plaintiff in the above entitled cause, and that Guy Terry Holder, witness for the plaintiff resides at Birmingham, Alabama, which is more than one hundred miles from the City of Bay Minette, Alabama, computed by the route usually travelled, that his personal attendance is necessary to a proper decision of this cause, and that his deposition would be insufficient for that purpose.

Augustine Meaher III
Augustine Meaher, III

Subscribed and sworn to before me this

the 22nd day of February, 1968.

Barbara Nicholson
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

FILED

FEB 23 1968

ALICE J. DUCK CLERK
REGISTER

36

RONALD LEE RIDINGS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	
)	AT LAW
EDWIN AVON BARKS,)	
JOHN F. BARKS, JOHN F.)	
BARKS, JR., separately)	
and severally,)	
Defendants.)	CASE NO. <u>7576</u>

COUNT ONE

Plaintiff claims of the defendants, separately and severally, the sum of \$5,000.00, as damages for that on, to-wit, October 11, 1966, defendant Edwin Avon Barks, while acting as an agent, servant, or employee of defendants John F. Barks and John F. Barks, Jr. and who was then and there acting within the line and scope of his authority as such, so negligently operated an automobile on U.S. Highway No. 98, a public road in the County of Baldwin, State of Alabama, at or near the intersection of said road with old U.S. Highway No. 98, a public road in said County and said State, which said intersection is to-wit, one-half mile South of D'Olive Creek, that the said automobile then and there operated by defendant Edwin Avon Barks collided with the plaintiff who was then and there driving his automobile on said U.S. Highway No. 98 at said time and place, and as a proximate result of the negligence of the defendants as aforesaid, plaintiff was thrown on to the paved portion of said U.S. Highway No. 98, his arms and legs were badly bruised and lacerated, he was made sick and sore, he was caused to endure and suffer great mental and physical pain and anguish and will suffer such mental pain and anguish in the future, he was caused to incur

medical bills in the treatment of his injuries, he was caused to lose time from his employment, plaintiff's automobile was bent, broken, smashed, and otherwise rendered permanently less valuable in that it was knocked out of alignment, the left rear tail light was smashed, the left rear fender was smashed, the left front fender was broken, the left front wheel was knocked loose from it's bearings, the steering rod was bent, all to plaintiff's damages as aforesaid, and for all of which plaintiff brings this suit.

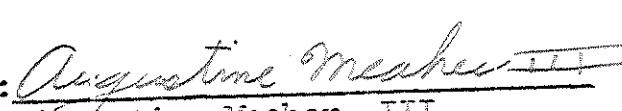
CHASON, STONE & CHASON
Attorneys for Plaintiff

By:


Norborne Stone, Jr.

LYONS, REYES AND COOK
Attorneys for Plaintiff

By:


Augustine Meaher, III

Plaintiff demands a trial by jury.


Augustine Meaher, III

Defendants may be served at the following address:

Route 1, Box 139
Daphne, Alabama

FILED

AUG 22 1951

ALICE L. DICK, CLERK
REGISTER

Received 22 day of June 1967
and on _____ day of _____ 19____

I served a copy of the within S & C
on John J. Barks

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Received 22 day of June 1967
and on _____ day of _____ 19____

I served a copy of the within S & C
on John J. Barks, Jr.

By service on Edwin Aven Barks, minor

John J. Barks, parent
And custodian of minor

TAYLOR WILKINS, Sheriff

By _____ D. S.

Received 22 day of June 1967
and on _____ day of _____ 19____

I served a copy of the within S & C
on Edwin Aven Barks

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Received 22 day of June 1967
and on _____ day of _____ 19____

I served a copy of the within S & C
on John J. Barks, Jr.

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

26
28

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7576

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Edwin Avon Barks, John F. Barks, John F. Barks, Jr

Separately & Severally

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 Edwin Avon Barks,

John F. Barks, John F. Barks, Jr, Separately & Severally, Defendant

by Ronald Lee Ridings

Plaintiff

Witness my hand this 22nd day of June 1967

Oliver J. Smith Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

RONALD LEE RIDINGS

Plaintiffs

vs.

EDWIN AVON BARKS, JOHN F. BARKS,

Defendants

JOHN F. BARKS, JR., Separately &

Severally

SUMMONS AND COMPLAINT

Filed June 22, 1967

Alice J. Duck

Clerk

Lyons, Pipes & Cook

Chason, Stone & Chason

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

JUN 22 1967

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this June 27, 1967

by leaving a copy with

Edwin Avon Barks

Spanish Fort

John F. Barks

John F. Barks Jr.

Spanish Fort

Sheriff claims

Fees at

[Tax Cents per mile Total \$ 3.20]

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins

Sheriff

Roy Randall

Deputy Sheriff

RONALD LEE RIDINGS,	:	IN THE CIRCUIT COURT OF
	:	
Plaintiff	:	BALDWIN COUNTY, ALABAMA
	:	
vs.	:	
	:	
EDWIN AVON BARKS,	:	
JOHN F. BARKS, JOHN F.	:	AT LAW
BARKS, JR., separately	:	
and severally,	:	
	:	
Defendants.	:	CASE NO. 7576

AMENDED ANSWER


Comes now the separate and several defendant John F. Barks in the above-styled cause and amends his answer heretofore filed, and for answer to each separate and several count of the complaint filed herein, assigns the following separate and several pleas, separately and severally:

1. Not guilty.
2. The material allegations thereof are untrue.
3. At the time and place described in said count, the plaintiff himself so negligently operated a motor vehicle as to contribute proximately and directly to the collision and to the injuries and damages described in said count.
4. The Defendant John F. Barks claims of the Plaintiff in recoupment the sum of Five Thousand Dollars (\$5,000.00), as damages, for that on, to-wit, October 11, 1966, the Plaintiff so wantonly operated a motor vehicle on U. S. Highway 98 at or near its intersection with

Old U. S. Highway 98, both of which are public Highways in the County of Baldwin, State of Alabama, as to cause or allow said motor vehicle to collide with the motor vehicle of the Defendant John F. Barks which was being operated on said U. S. Highway 98 at or near the intersection of said Old U. S. Highway 98, and as a direct and proximate result and consequence of the aforesaid wantonness on the part of the Plaintiff, the motor vehicle of the Defendant John F. Barks was wantonly injured and damaged in that it was bent, broken, dented, and otherwise damaged. The Defendant John F. Barks claims punitive damages of the plaintiff.

5. The Defendant John F. Barks claims of the Plaintiff in recoupment the sum of One Thousand Dollars (\$1,000.00), as damages, for that on, to-wit, October 11, 1966, the Plaintiff so negligently operated a motor vehicle on U. S. Highway 98 at or near its intersection with Old U. S. Highway 98, both of which are public Highways in the County of Baldwin, State of Alabama, as to cause or allow said motor vehicle to collide with the motor vehicle of the Defendant John F. Barks which was being operated on said U. S. Highway 98 at or near the intersection of said Old U. S. Highway 98, and as a direct and proximate result and consequence of the aforesaid negligence on the part of the Plaintiff, the motor vehicle of the Defendant John F. Barks was bent,

broken, dented and damaged.

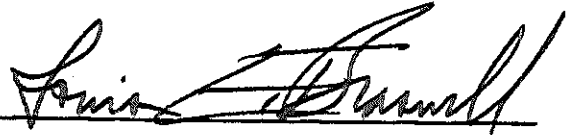

Attorney for Defendant
John F. Barks
First National Bank Building
Mobile, Alabama

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES AND JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to Norborne C. Stone, Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office on this the 1 day of August, 1967.



FILED

AUG 2 1967

ALICE J. RICH, CLERK
REGISTER