

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:

P O DRAWER C

OR 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. BREVARO 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
A. CLAY RANKIN, III
ALAN E. RIFFLE

February 26, 1968

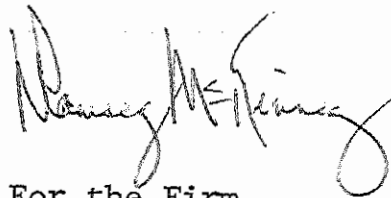
Alice J. Duck, Clerk Register
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: George B. Clarke vs.
Vernon M. Spears and
Doxol Gas, Inc.
Case No. 7936

Dear Mrs. Duck:

The plaintiff's attorney in the above-styled case
has consented to service of the enclosed interrogatories,
and I have mailed a copy to him.

Very truly yours,



For the Firm

WRM.bb

Enclosure

GEORGE B. CLARKE,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
VS.)	AT LAW
)	
VERNON M. SPEARS and)	
DOXOL GAS, INC., a)	
corporation,)	
)	
Defendants.)	CASE NO. 7936

ANSWERS TO INTERROGATORIES

Comes now George B. Clarke, and answers the interrogatories propounded to the plaintiff by the defendants, as follows:

1. George B. Clarke, Jr. 48, P. O. Box 37, Point Clear, Alabama. Alabama Dry Dock and Shipbuilding Company, Mobile, Ala.
2. Ford V8 1965, Fairlane, Fordor Sedan
 - (a) George B. Clarke, Jr., P. O. Box 37, Point Clear, Alabama.
 - (b) George B. Clarke, Jr., March 22, 1965.
 - (c) \$2,945.42.
 - (d) None.
3. (a) See attached estimate from Bolton Ford of Mobile, Inc. and Treadwell Ford of Mobile.
 - (b) Damage repaired by Bolton Ford, See attached invoice.
 - (c) George B. Clarke, Jr.
 - (d) Seven days
 - (e) Vehicle not sold as of this date.
 - (f) Approximately 25,000 miles.
 - (g) 47,100 miles.
 - (h) Brakes good, horn good, steering apparatus good, tires and lighting equipment good.
 - (i) No official inspection performed or required in area in which was operated.

4. See attached report filed (Form SR-13) with Safety Responsibility Unit, P. O. Box 1471, Montgomery, Alabama.

- (a) See report above.
- (b) See report above.
- (c) Approximately 500-700 feet to rear.
- (d) Approximately 500-700 feet to front.
- (e) None

5. See report as outlined in (4) above.

- (a) Same as above.
- (b) Same as above.
- (c) Same as above.
- (d) None.

6. See 4 (c) above.

- (a) Yes.
- (b) See 4 (c) above.
- (c) See 4 (c) above.
- (d) Not applicable.
- (e) Not applicable.
- (f) No traffic signal lights in area.
- (g) See report as outlined in (4) above.
- (h) Not applicable.

7. No.

- (a) Not applicable.
- (b) Not applicable.

- 8.
- (a) Proceeding slowly in right lane, approximately 10-15 miles per hour.
 - (b) Proceeding slowly in right lane, approximately 10-15 miles per hour.
 - (c) Proceeding slowly and turning left, approximately 10-15 miles per hour.
 - (d) Proceeding slowly and turning left, approximately 10-15 miles per hour.
 - (e) Proceeding slowly and turning left, approximately 10-15 miles per hour.
 - (f) Proceeding slowly and turning left, approximately 5 miles per hour.

(g) Proceeding slowly and turning into driveway on left side of road at approximately 2-5 miles per hour.

(h) 0.

9. See report attached as outlined in (4) above.

(a) Approximately 21 feet.

(b) See report as outlined in (4) above and also 8(a) through (h) above.

10. (a) See 8 (a) through (h) above.

(b) See report attached as outlined in (4) above.

11. Yes, brakes applied.

(a) 45-50 miles per hour.

(b) Approximately 105 feet.

(c) Approximately 110 feet.

12. Right front forward end of plaintiff's car contacted left side of defendant's car just forward of left rear wheel. No other contact.

13. Defendant's vehicle approximately 5-10 feet.

Plaintiff's vehicle approximately 5 feet.

(a) Defendant's vehicle ahead and skidded to side.

(b) Plaintiff's vehicle approximately straight ahead.

(c) See report attached as outlined in (4) above.

(d) See report attached as outlined in (4) above.

14. (a) 45-50 miles per hour.

(b) 45-50 miles per hour.

(c) Brakes applied and skid marks started 105 feet from point of impact.

(d) Indeterminate, car skidding.

(e) Indeterminate, car skidding.

(f) Indeterminate, car skidding.

(g) Approximately 5-10 miles per hour.

(h) Same as (a) above.

15. No horns sounded.

- (a) No stopping or turning signals were given.
- (b) None given.

16. No other vehicles in sight in either direction.

- (a) Not applicable.
- (b) Not applicable.
- (c) Not applicable.

17. (a) See item 21 of report attached as outlined in (4) above. Statement per item 21 made when plaintiff got out of car and walked up to defendant.

- (b) See defendant's statement.
- (c) No witnesses present.



George B. Clarke, Plaintiff

STATE OF ALABAMA:
COUNTY OF Baldwin :

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


George B. Clarke, Plaintiff

Subscribed and sworn to before me
on this 9th day of July, 1968.


NOTARY PUBLIC, State of Texas, ALABAMA

Filed 7-12-68
Wm. J. Duck

BOLTON FORD OF MOBILE, INC.

201 ST. JOSEPH STREET PHONE 433-1541
MOBILE, ALABAMA

SALES & SERVICE

ESTIMATE
OF REPAIRS

NAME <i>A. B. Clarke Jr.</i>		ADDRESS <i>P.O. Box 37</i>		DATE <i>1-8-67</i>	
MAKE OF CAR <i>Fair 500</i>	YEAR <i>65</i>	TYPE <i>4dr</i>	LICENSE NUMBER	MILEAGE	MOTOR NO.
INSURED BY <i>Regal Ind.</i>		ADJUSTER <i>Mr. Bayington</i>		INSPECTOR <i>J. J. J.</i>	PHONE HOME BUSINESS <i>EX 1, 370</i> <i>4-32-PR-21</i>

	DESCRIPTION of REPAIRS and REPLACEMENTS	PARTS		LABOR HOURS	SUBLET AMOUNT
		NUMBER	AMOUNT		
1	Bumper Fnt. (R.C.)		29.80	1.2	
2	" " " " " " " " " " " "		34.25	.4	
1	Gravel D. Sph.		8.80	.6	
1	Grille Assy.		16.60	.4	
1	" " " " " " " " " " " "		5.40	.2	
1	Ltr. Rod End L. Side			1.2	
1	Headlight Body R. Side		9.10	.6	
1	" " " " " " " " " " " "		3.10	-	
1	" " " " " " " " " " " "		5.10	.3	
2	Sealed Beams - Inner & Outer 1.65 E.		3.30	-	
1	Fender R. Fnt.		48.85	2.0	
1	" " " " " " " " " " " "		1.95	-	
	Ltr. Warner Fender Skirt R.			1.0	
	Ltr. Hand & M. Pipe			2.5	
1	" " " " " " " " " " " "		2.95	.3	
1	Fender L. Fnt. on L. Fnt. at H/Light		5.10	.3	
	M. Pipe L. Fnt. Fender at L. Fnt.			.5	
	Paint & Mat.				22.50
TOTAL			144.80		

The above is an estimate based on our inspection and does not cover any additional parts or labor which may be required after the work has been opened up. Occasionally after the work has started, worn or damaged parts are discovered which are not evident on the first inspection. Because of this the above prices are not guaranteed, and are for immediate acceptance only.

Due to shortage of parts, we reserve the right to straighten a part when a new part is not available, at the same price as quoted for new part. We also reserve the right to refund the amount covering any part we are unable to furnish or repair.

(Subject to Price Changes — Estimate voided after 30 days.)

Labor	11.5	@ \$	6.50	\$	6.75
Parts-Less	25	% (36.20)	\$	108.60
Sublet		% (\$	22.50
Tax	6	% (\$	6.51
Wrecker & Storage				\$	
TOTAL	206.61			\$	206.61



OWNER:

Mr. E. A. Clark

DATE:

1-9-67

APPRaised
FOR:

Joseph C. Anderson.

YEAR

MAKE

BODY STYLE

MODEL

MILEAGE

LICENSE

APPRAISER:

Johnson

IDENTIFICATION #

The Below Agrees To Make Guaranteed Repairs As Per Appraisal, When Authorized By Owner.

Accepted By:

Garage:

A-Align

1-2-New

OH-Overhaul

S-Straighten

R-Repair

THIS IS NOT AN AUTHORIZATION FOR REPAIRS

LABOR 5.3 HRS.

@605

5 7780

PARTS 11.90 LESS:

57%

5	8	3	7	2
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NET & SUBLET

\$ 65.20

TAX

5 209

TOTAL

09/07/2018

CENTRAL RECORDS

JAN 13 1967

Code ()

LOCATION OF ACCIDENT

DATE

ACCIDENT OCCURRED IN

CITY OR TOWN

COUNTY

RURAL

1/2 mile North
1/2 mile South
1/2 mile East
1/2 mile West

Center of
1/2 mile of

Fairhope

Baldwin

City or Town

County

Indicate exact mileage, using two mileages and two directions if necessary.

ACCIDENT OCCURRED ON:

U.S. 98

Give name of street or alley or highway number. (U. S., State, County). If no highway number, identify by name.

1/2 At intersection with

OR Give name of street or alley or highway number. (U. S., State, County). If no highway number, identify by name.

1/2 Not at

1/2 intersection

1/2 feet North

1/2 feet South

1/2 feet East

1/2 feet West

of Rail System Power Pole # 68-3

Name (or other name) nearest intersecting street, house number, power or telephone pole (give number), highway, curve, bridge, railroad crossing, filling station, alley, driveway, culvert, guard-rail, mile post, underpass, overpass, or identifying landmark. Show exact distance, using two directions and distances if necessary. See diagram for further detail.

TIME OF ACCIDENT

Day of the week Sun.

Date 8 Jan. 1967

Hour 10:00 A.M.

Standard Daylight saving

ACCIDENT INVOLVED: 1/2 Pedestrian 1/2 Other motor vehicle 1/2 R.R. train 1/2 Street car 1/2 Animal-drawn vehicle 1/2 Bicycle 1/2 Fixed object 1/2 Animal (ridden, herded, unattended) 1/2 Overturned in roadway 1/2 Ran off roadway 1/2 Other non-collision (fell from veh., fire, etc.) 1/2 Other (explain in Remarks)

VEHICLE NO. 1

1965 Chev. 4 dr.

Year and Make Type (such as sedan, cab, truck, bus, etc. Describe trailer, if any).

Permit No. None

Registration 67 5-11928 Ala.

Year No. State

Direction East

On U.S. 98

Amount of damage to this vehicle \$ 175

North E. W. etc.

Street name, highway No., alley, driveway, etc.

Driver by Herman M. Sparks

553 Kumquat St. Fairhope, Ala. color: Cav.

Day 05 Month 03 Year 2000 Sex M

Driving experience

25 years

Ala. 0858136

Chauffeur's Operator's

Regular

Occupation Doral Gas Co.

Birth Date

Years

State Number

Describe type, such as regular, junior, etc.

Owned by Doral Gas Co.

Address: Fairhope, Ala.

Speed before accident 15-20 m.p.h.

Speed at moment of accident 10 m.p.h.

Distance vehicle traveled after impact 24 Feet

Lawful speed 60 m.p.h.

Maximum safe speed under conditions prevailing 50 m.p.h.

VEHICLE NO. 2

1965 Fairlane Ford

Year and Make Type (such as sedan, cab, truck, bus, etc. Describe trailer, if any).

Permit No. None

Registration 67 5-8141 Ala.

Year No. State

Direction East

On U.S. 98

Amount of damage to this vehicle \$ 325

North E. W. etc.

Street name, highway No., alley, driveway, etc.

Driver by George B. Clarke Jr.

P.O. Box 37 Point Clear, Ala. color: Cav.

Day 14 Month 01 Year 2000 Sex M

Driving experience

25 years

Ala. 0393280

Chauffeur's Operator's

Regular

Occupation Engineer

Birth Date

Years

State Number

Describe type, such as regular, junior, etc.

Owned by George B. Clarke Jr.

Address: P.O. Box 37 Point Clear, Ala.

Speed before accident 55-60 m.p.h.

Speed at moment of accident 10-15 m.p.h.

Distance vehicle traveled after impact 12 Feet

Lawful speed 60 m.p.h.

Maximum safe speed under conditions prevailing 50 m.p.h.

Damage to all property other than vehicles

None

None

Name object, show ownership, and state nature and amount of damage

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WITNESSES
Name Address Where was witness?
Name Address Where was witness?
Name Address Where was witness?

ACTS OF PEDESTRIAN
1. Crossing at intersection—without signal.
2. Crossing against signal.
3. Crossing on signal.
4. Crossing on red light.
5. Crossing on red light at intersection.
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100. Crossing on red light at intersection.

MOVEMENT OF VEHICLES

Vehicle 1 2 3

1 2 3 1. Making right turn

2 3 1 2. Making left turn

3 1 2 3. Making left turn

1 2 3 4. Making left turn

2 3 1 5. Making left turn

3 1 2 6. Making left turn

1 2 3 7. Making left turn

2 3 1 8. Making left turn

3 1 2 9. Making left turn

1 2 3 10. Making left turn

2 3 1 11. Making left turn

3 1 2 12. Making left turn

1 2 3 13. Making left turn

2 3 1 14. Making left turn

3 1 2 15. Making left turn

1 2 3 16. Making left turn

2 3 1 17. Making left turn

3 1 2 18. Making left turn

1 2 3 19. Making left turn

2 3 1 20. Making left turn

3 1 2 21. Making left turn

1 2 3 22. Making left turn

2 3 1 23. Making left turn

3 1 2 24. Making left turn

1 2 3 25. Making left turn

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3 1 2 27. Making left turn

1 2 3 28. Making left turn

2 3 1 29. Making left turn

3 1 2 30. Making left turn

1 2 3 31. Making left turn

2 3 1 32. Making left turn

3 1 2 33. Making left turn

1 2 3 34. Making left turn

2 3 1 35. Making left turn

3 1 2 36. Making left turn

Vehicle

1 2 3

1 2 3 1. Making right turn

2 3 1 2. Making left turn

3 1 2 3. Making left turn

1 2 3 4. Making left turn

2 3 1 5. Making left turn

3 1 2 6. Making left turn

1 2 3 7. Making left turn

2 3 1 8. Making left turn

3 1 2 9. Making left turn

1 2 3 10. Making left turn

2 3 1 11. Making left turn

3 1 2 12. Making left turn

1 2 3 13. Making left turn

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3 1 2 63. Making left turn

1 2 3 64. Making left turn

2 3 1 65. Making left turn

3 1 2 66. Making left turn

1 2 3 67. Making left turn

2 3 1 68. Making left turn

3 1 2 69. Making left turn

1 2 3 70. Making left turn

INDICATE ON THIS DIAGRAM WHAT HAPPENED

DRAW HEAVY LINES TO SHOW
MAIN ROADS, SIDE-ROADS, DRIVEWAYS, ETC.

INDICATE
NORTH
BY ARROW



← U.S. 98 East

→ Fairhope 5.3 miles → West

Point of Impact

Pvt. Drive

104 Feet

POINT OF IMPACT (Check one for each vehicle involved)				CONDITION OF DRIVER OR PEDESTRIAN				Explain conditions
Vehicle 1		Vehicle 2		Vehicle 1		Vehicle 2		
1	2	3	4	1	2	3	4	
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CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing answers to interrogatories on Hand, Arendall, Bedsole, Greaves & Johnson, Attorneys for Defendant, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorneys at their office in Mobile, Alabama, on this the 25th day of July, 1968.

Will Hay

FILED

JUL 29 1968

ALICE J. DUCK CLERK
REGISTER

7966L

HAYES & WILKINS

LAWYERS

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

WILSON HAYES
TAYLOR D. WILKINS, JR.

TELEPHONE 937-5506

February 9, 1968

Mrs. Alice J. Duck
Clerk
Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Please find enclosed a replication for the case
of George B. Clarke vs Vernon M. Spears et al, #7936.

Yours very truly,



Wilson Hayes

WH/rkh
Encl: 1

Please return to: W. Ramsey McKinney, Esq.
P. O. Box 123
Mobile, Alabama 36601

Case No. 7936

Mobile, Ala. August 14, 1968

File No. WRM

Received of HAND, ARENDALL, BEDSOLE,
GREAVES & JOHNSTON

GEORGE B. CLARKE,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

Plaintiff :

VS.

VERNON M. SPEARS and

DOXOL GAS, INC., a

corporation, :

Defendant

1. *Chlorophyll a* (Chl *a*)
 2. *Chlorophyll b* (Chl *b*)
 3. *Chlorophyll c* (Chl *c*)
 4. *Chlorophyll d* (Chl *d*)
 5. *Chlorophyll e* (Chl *e*)
 6. *Chlorophyll f* (Chl *f*)
 7. *Chlorophyll g* (Chl *g*)
 8. *Chlorophyll h* (Chl *h*)
 9. *Chlorophyll i* (Chl *i*)
 10. *Chlorophyll j* (Chl *j*)
 11. *Chlorophyll k* (Chl *k*)
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 133.

100-25000

ALBION J. BALDWIN
CLERK
For the Clerk of the Circuit
Court of Mobile County, Ala.
Baldwin

PLEASE STAMP DATE

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:
P O DRAWER C
OR 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. BREVARD 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 C. 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
A. CLAY RANKIN, III
ALAN E. RIFFLE

August 14, 1968

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

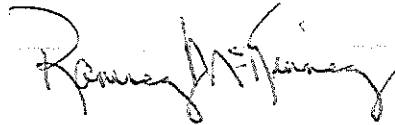
Re: George B. Clarke vs. Vernon
M. Spears and Doxol Gas, Inc.
Case No. 7936

Dear Mrs. Duck:

Please let me know as soon as the above-styled case is set for trial. Both Mr. Hayes, who represents the plaintiff, and I are anxious to have this case tried as soon as it is convenient with the court.

Thank you very much.

Very truly yours,



For the Firm

WRM.bb

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

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HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. MCDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.

January 20, 1969

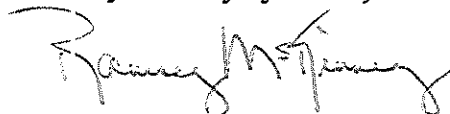
Mrs. Alice J. Duck
Clerk, Circuit Court
of Baldwin County
Bay Minette, Alabama

Re: George B. Clarke v. Vernon
M. Spears and Doxol Gas, Inc.
Case No. 7936

Dear Mrs. Duck:

Please issue a subpoena to C. D. Johnston, badge number 208, to appear and testify in the above styled case, which is set for trial on January 30, 1969. Mr. Johnston may be served at the Alabama State Troopers office in Foley, Alabama. Personal service is requested.

Very truly yours,



For the Firm

PWB.tif

GEORGE B. CLARKE, : IN THE CIRCUIT COURT OF
 Plaintiff, : BALDWIN COUNTY, ALABAMA
 vs. : AT LAW
 VERNON M. SPEARS and :
 DOXOL GAS, INC., :
 a corporation, :
 Defendants. : CASE NO. 7936

MOTION TO REQUIRE ANSWERS TO INTERROGATORIES

Comes now each of the following defendants, separately and severally, Vernon M. Spears and Doxol Gas, Inc., a corporation, and shows unto the Court that each said defendant has filed with the Clerk of the Court interrogatories directed to the plaintiff; that said interrogatories were served on the plaintiff, on, to-wit, the 29th day of February, 1968; that more than sixty days have elapsed since said date and that the plaintiff has not answered said interrogatories.

WHEREFORE, each said defendant moves the Court to attach the plaintiff and to cause the plaintiff to answer fully in open Court, or to tax the plaintiff with such costs as may be just and to continue the cause until full answers are made, or to direct a non-suit to be entered, or to render such other judgment or decree as would be appropriate if the plaintiff had offered no evidence, or to require the plaintiff to answer said interrogatories on or before a day certain to be fixed by the Court.

Paul W. Brock
 Paul W. Brock

W. Ramsey McKinney
 W. Ramsey McKinney
 Attorneys for Defendants

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

JUN 28 1968

J. DUCK
 CLERK
 REGISTER

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing ^{motion} ~~interrogatories~~ on Hayes and Boggs, Attorneys for Plaintiff, by depositing same in the United States mail, postage prepaid, addressed to said attorneys at their office in Spanish Fort, Alabama, on this, the 27th day of June, 1968.

W. Ramsey McKinney

GEORGE B. CLARKE,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
VERNON M. SPEARS and)	
DOXOL GAS, INC., a)	
corporation,)	
Defendants.)	CASE NO. 7936

ANSWERS TO INTERROGATORIES

Comes now Vernon M. Spears, individually and as an employee of Doxol Gas, Inc., who is cognizant of the facts, and answers the interrogatories propounded to the defendants by the plaintiff, as follows:

1. Vernon M. Spears, 48, 606 Johnson Avenue, Fairhope, Alabama, Drawer AF, Fairhope, Alabama. Doxol Gas, Inc., Drawer AF, Fairhope, Alabama.

2. 1965, Biscayne, two-door Chevrolet.

- (a) Doxol Gas, Inc.; Drawer AF, Fairhope, Alabama.
- (b) Suburban Gas Company, May 15, 1965.
- (c) \$2,399.00.
- (d) None.

3. Copy of repair bill attached, which shows items of damage. Fair reasonable market value prior to said accident—\$2,500.00; fair reasonable market value subsequent to said accident—\$2,100.00.

- (a) Copy of repair estimate attached which gives the information called for.
- (b) Yes. Copy of repair bill showing name and address of repair company is attached.

- (c) Suburban Gas Company.
- (d) Approximately five days.
- (e) Sold to Solomon Motor Company, Dothan, Alabama for \$1,100.00.
- (f) Approximately 38,000 miles.
- (g) Unknown.
- (h) The condition of the brakes, horn, steering apparatus, tires and lighting equipment on said motor vehicle were each good.
- (i) Said vehicle was checked and lubricated every 1,000 miles. Fairhope Shell.

4. Copy of sketch is attached.

5. Yes.

- (a) At intersection of U.S. Highway 98 and private driveway.
- (b) None.
- (c) Terrain was flat, road was straight at point of accident.
- (d) None.

6. I do not understand interrogatories 6, 6(a), 6(b), 6(c), and 6(d). I am one of the named defendants in this suit.

- (f) There were no traffic signal lights at the location of the accident.
- (g) Approximately two to three feet left of the center line.
- (h) I was beginning to enter a private driveway.

7. None.

(a) None.

(b) None.

8. I do not understand this question. I am one of the defendants named in this lawsuit.

9. Both vehicles were traveling in the same direction along U.S. Highway 98 East.

(a) 21 feet.

(b) I was making a gradual left turn. Naturally, in making this turn, I crossed the center line of the highway.

10. I turned on my left turn signal, glanced in my rear view mirror and began gradually applying my brakes to slow my vehicle to a turning speed. Then I began making a gradual left turn. At this point the impact occurred.

(a) I do not understand this question. I am one of the named defendants in this lawsuit.

(b) As stated above, I was making a gradual left turn.

11. Yes.

(a) Approximately 20 miles an hour.

(b) Approximately 150 to 200 feet.

(c) Approximately the same distance as stated in (b).

12. The left rear of my vehicle, and the right front of Mr. Clarke's vehicle. My left front then came into contact with Mr. Clarke's left front.

13. My car traveled approximately eight to ten feet in a spin. Mr. Clarke's vehicle bounced back approximately two to three feet after impact.

(a) Already answered immediately above.

(b) My vehicle left skid marks as it spun around after impact.

(c) Mr. Clarke's vehicle left approximately 104 feet to 108 feet of skid marks leading up to the point of collision.

(d) Both vehicles came to rest on the left of the center line. My vehicle was spun around 180° from the direction in which I had been traveling. Mr. Clarke's vehicle came to rest on the left of the center line, facing in the same direction in which he had been traveling.

14. (a) Approximately 20 miles per hour.

(b) Approximately 15 miles per hour.

(c) Approximately 10 miles per hour.

(d) Approximately 8 to 10 miles per hour.

(e) Approximately the same as in (d).

(f) Approximately five miles per hour.

(g) Approximately the same as in (f).

(h) Approximately the same as in (f).

15. I heard no horn or any other signal of warning.

(a) I gave a left turn signal approximately 300 feet from the point of collision.

(b) As stated above, I heard no passing signal of warning.

16. None.

(a) No answer required.

(b) No answer required.

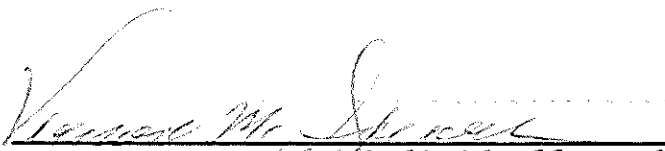
(c) No answer required.

17. Yes.

(a) Immediately after the collision I got out of my vehicle and introduced myself and asked Mr. Clarke if I could see his driver's license.


(b) I do not understand this question. I am one of the defendants named in this lawsuit. However, at the scene of the accident, Mr. Clarke stated that he was going to be late for his football game on television.

(c) None.

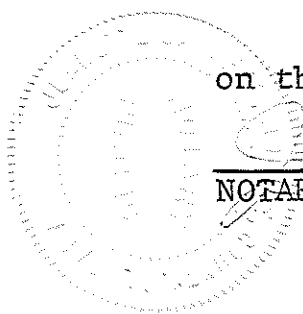

Vernon M. Spears, individually and
as an employee of Doxol Gas, Inc.

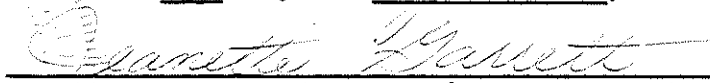
STATE OF ALABAMA:
COUNTY OF Mobile:

Before me, the undersigned authority in and for said County in said State, personally appeared Vernon M. Spears, individually and as an employee of Doxol Gas, Inc., who being by me first duly sworn, doth depose and say that the foregoing answers to interrogatories are true and correct.


Vernon M. Spears, individually and
as an employee of Doxol Gas, Inc.

Subscribed and sworn to before me
on this 27th day of June, 1968.




NOTARY PUBLIC, Mobile COUNTY, ALABAMA

FILED

JUN 28 1968

ALICE J. DUCK CLERK
REGISTER

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing answers to interrogatories on Hayes and Boggs, Attorneys for Plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorneys at their office in Spanish Fort, Alabama, on this, the 27th day of June, 1968.

N. Ramsey AS Finney

Skid marks left by
Mr. Clarke's vehicle

CLARK'S
Vehicle

My vehicle

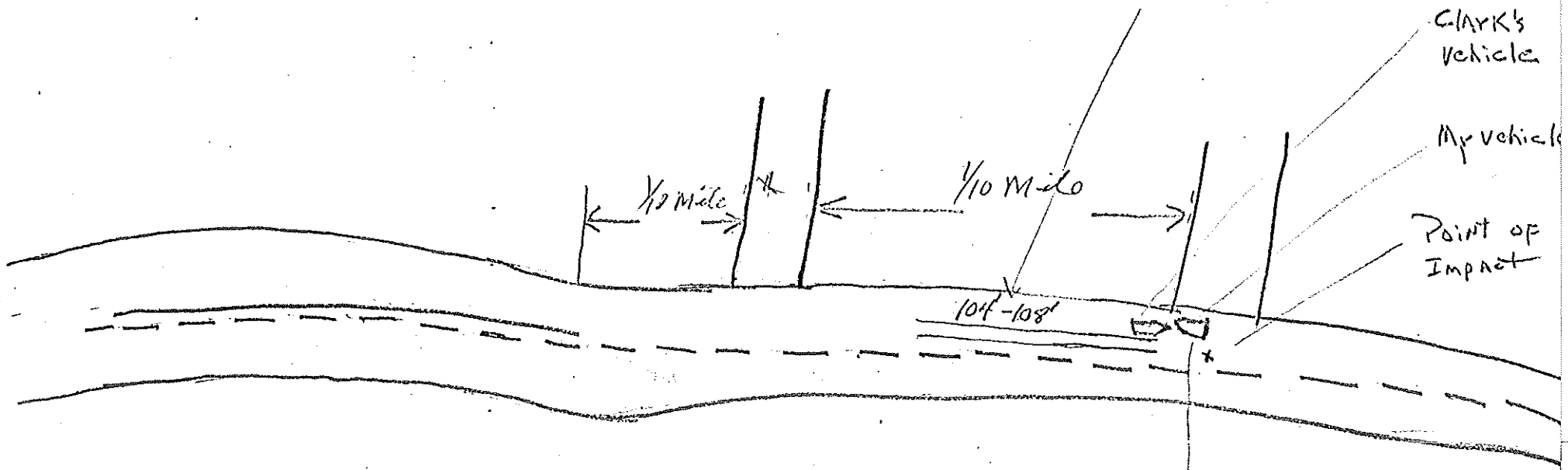
Point of
Impact

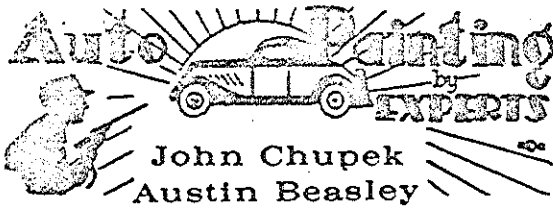
$\frac{1}{10}$ Mile

$\frac{1}{10}$ Mile

104'-108'

This is where I
first saw CLARK'S
vehicle





Fairhope Paint & Body Shop

452 MORPHY AVE.

FAIRHOPE, ALABAMA

MEMORANDUM
ESTIMATE OF REPAIR COST

NAME Digital Detail Inc. Co. Inc. DATE 1-8-67 NO. _____
 ADDRESS Fairhope, Ala. PHONE _____

BELOW IS OUR ESTIMATE TO REPAIR YOUR

AUTOMOBILE

MODEL	LICENSE NO.	MOTOR NO.	SERIAL NO.	MILEAGE	
1965 Chev					
PARTS NECESSARY AND ESTIMATE OF LABOR REQUIRED			PAINT COST ESTIMATE	PARTS COST ESTIMATE	LABOR COST ESTIMATE
Replace left quarter panel				78 60	92 00
" " rear wheel				10 94	1 50
" " quarter Mldy.				6 85	11 00
" " taillight assy				9 45	
Less 10% discount				105 84	
				105 84	
				95 26	
Paint			14 31		
Mat				4 00	
				99 26	
TAX				3 98	
TOTALS			14 31	103 24	98 50
PAINT, PARTS AND LABOR ESTIMATE GRAND TOTAL				211 05	

The above is an estimate based on our inspection and does not cover any additional parts or labor which may be required after

CAR INVOICE



SOLOMON MOTOR COMPANY, Inc.

Telephone 794-6785

DOTHAN, ALABAMA

No. 14408

2/12/68

SOLD TO: Doxol Gas of Fairhope,
 ADDRESS Fairhope Avenue
 Fairhope, Alabama

ASSET

SALESMAN: Lane

PURCHASE ORDER # 8309

MAKE	MODEL	NEW OR USED	SERIAL NO.	ENGINE No.	KEY NO.
Chev	1968 (CS20904) 3/4 Ton Stepside Pickup	New	CS248A134309	Stock # 430	6P21

PRICE OF CAR
 OPTIONAL EQUIP. & ACCESS.
 FREIGHT AND HANDLING

\$2700.55

INSURANCE COVERAGE INCLUDES

- ☐ FIRE AND THEFT
☐ COLLISION — AMT. DEDUCT.
☐ PUBLIC LIABILITY — AMT.
☐ PROPERTY DAMAGE — AMT.

OPTIONAL EQUIPMENT AND ACCESSORIES

GROUP	DESCRIPTION	PRICE
	4 speed transmission	
	292 cu. in 6 cyl. engine	
	Auxiliary springs	
	Rear step bumper	
	42 amp generator	
	Jr. West coast mirrors	
	Foam seat	
	7.00 x 16 6 ply over size tires	

SALES TAX 28.01
 LICENSE AND TITLE 23.25
 TOTAL CASH PRICE \$2751.78
 81

FINANCING
 INSURANCE
 TOTAL TIME PRICE

SETTLEMENT:

DEPOSIT
 CASH ON DELIVERY
 USED CAR 65 Chev
 TYPE Biscayne 2-Dr 1100.00
 SER. NO.
 ENG. NO.
 XXXXXX ACCOUNT 1651.78
 81

TOTAL

VOI. DATE 2-28	VOI. NO. 1162
VENDOR NO. 633	INV. DATE 2-12
BUY 3-05	EXT. CHFD. PH
GEN. ACCT. - AMOUNT 4565	PRICE APP'D.
	TRANSFER ACCT. AMOUNT 727.1234
NET 1,651.81	DISC. /

motor #
 154115
 D 153571

ALWAYS SHOW SERIAL, ENGINE AND KEY NUMBERS

FORM 6 DSA-131 (1-62)
 THE REYNOLDS & REYNOLDS CO., CLEVELAND, OHIO
 LITHO IN U.S.A.

GEORGE B. CLARKE,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
vs.)	AT LAW
)	
VERNON M. SPEARS and)	
DOXOL GAS, INC.,)	
a corporation,)	
)	
Defendants.)	CASE NO. 7936

INTERROGATORIES TO THE DEFENDANTS

Comes now the Plaintiff, G. B. Clarke, Individual, and, desiring the testimony of the defendants, Vernon M. Spears and Doxol Gas, Inc., a Corporation, propound to the defendant 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. Describe completely and in detail the vehicle driven 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 by whom said motor vehicle had been purchased prior to said accident, and give the date of the purchase. (c) How much was paid for said motor vehicle at the time of said purchase? (d) 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.

3. 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 nor 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 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. (f) Give the mileage reading of said motor vehicle at the time of the accident made the basis of this suit. (g) Give the mileage reading of said motor vehicle at the time of answering these interrogatories. (h) Describe the condition of the brakes, horn, steering apparatus, tires and lighting equipment on said motor vehicle, separately, at the time of the accident made the basis of this suit. (i) When had the brakes, horn, steering apparatus, lights and tires on said motor vehicle, separately, last been inspected prior to said accident, and by whom?

4. 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 after the accident. (c) Where you were located when you first saw the defendant's vehicle. (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.

5. State whether or not the accident made the basis of this suit occurred at an intersection of streets or highways, and, if so, then state: (a) At what intersection of streets or highways 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) 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. (d) 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.

6. 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 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, state the condition, if you know, of the color or the light which was facing the approaching driver. (g) Where did the impact occur with reference to the center line of the highway on which defendant's motor vehicle was traveling? (h) How far distant were you from the nearest intersection when the impact occurred?

7. 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 had obtained same, the quantity or amount consumed and the time and place where same was drunk.

8. 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.

9. 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 said street or highway. (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 with reference to the center line of the street, avenue, or highway on which said motor vehicle had been traveling prior to said turn.

10. State fully, specifically and in detail each and every act or thing done by you at the time of the accident made the basis of this suit during the last 300 feet leading to the point of impact, stating in your answer the chronological order in which you 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 driven by you immediately prior to said accident.

11. State whether or not the brakes on the vehicle 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.

12. State specifically what portion of the vehicles involved in the accident made the basis of this suit first came in contact with each other. Describe the portions which next came in contact after the initial impact.

13. 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 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. (c) Describe each and every skid mark which led up to the point of collision. (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.

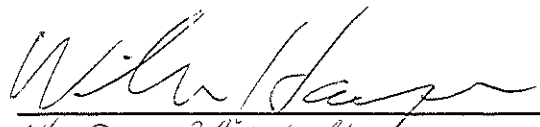
14. State the speed of the motor vehicle which you were driving, according to your best judgment, at the following points: (a) When you were within a distance of 300 feet from the point of impact in the accident made the basis of this suit. (b) When you were 200 feet from the point of impact. (c) When 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.

15. 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 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. (b) If any signals for passing 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.

16. 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.

17. 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) 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, 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.



Wm H. Hager Plaintiff.

STATE OF ALABAMA)

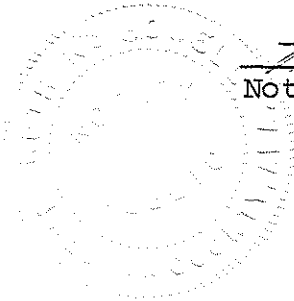
COUNTY OF BALDWIN)

Before me, the undersigned authority in and for said county in said state, this day personally appeared Wilson Hayes, 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 plaintiff in the above entitled cause, and as such is authorized to make this affidavit; that the answers of the defendants to the foregoing interrogatories, when well and truly made and filed, will be material testimony for said plaintiff on the trial of this cause.

Wilson Hayes

Sworn to and subscribed before me
on this 21st day of March,
1968.

Ruth K. Howell
Notary Public



CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing interrogatories on HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON, Attorneys for Defendants, by depositing same in the United States mail, postage prepaid, addressed to said attorneys at their office in Mobile, Alabama, on this, the 21st day of March, 1968.

Wilson Hayes

FILED

MAR 22 1968

ALICE J. DUCK CLERK
REGISTER

GEORGE B. CLARKE,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
VERNON M. SPEARS and)	
DOXOL GAS, INC.,)	
a corporation,)	
Defendants.)	CASE NO. 7936

INTERROGATORIES TO THE PLAINTIFF

Comes now each of the following defendants, separately and severally, Vernon M. Spears and Doxol Gas, Inc., a corporation, and, desiring the testimony of the plaintiff, propound 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. Describe completely and in detail the vehicle driven 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 by whom said motor vehicle had been purchased prior to said accident, and give the date of the purchase. (c) How much was paid for said motor vehicle at the time of said purchase? (d) 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.

3. 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 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. (f) Give the mileage reading of said motor vehicle at the time of the accident made the basis of this suit. (g) Give the mileage reading of said motor vehicle at the time of answering these interrogatories. (h) Describe the condition of the brakes, horn, steering apparatus, tires and lighting equipment on said motor vehicle, separately, at the time of the accident made the basis of this suit. (i) When had the brakes, horn, steering apparatus, lights and tires on said motor vehicle, separately, last been inspected prior to said accident, and by whom?

4. 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 after the accident. (c) Where you were located when you first saw the defendant's vehicle. (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.

5. State whether or not the accident made the basis of this suit occurred at an intersection of streets or highways, and, if so, then state: (a) At what intersection of streets or highways 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) 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. (d) 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.

6. 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 highway on which defendant's motor vehicle was traveling? (h) How far distant were you from the nearest intersection when the impact occurred?

7. 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 had obtained same, the quantity or amount consumed and the time and place where same was drunk.

8. 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.

9. 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 said street or highway. (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 with reference to the center line of the street, avenue, or highway on which said motor vehicle had been traveling prior to said turn.

10. State fully, specifically and in detail each and every act or thing done by you at the time of the accident made the basis of this suit during the last 300 feet leading to the point of impact, stating in your answer the chronological order in which you 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 driven by you immediately prior to said accident.

11. State whether or not the brakes on the vehicle 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.

12. State specifically what portion of the vehicles involved in the accident made the basis of this suit first came in contact with each other. Describe the portions which next came in contact after the initial impact.

13. 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 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. (c) Describe each and every skid mark which led up to the point of collision. (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.

14. State the speed of the motor vehicle which you were driving, 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.

15. 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 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. (b) If any signals for passing 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.

16. 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.

17. 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) 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, 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.

Paul W. Brock
Paul W. Brock


W. Ramsey McKinney
W. Ramsey McKinney
Attorneys for Defendants

OF COUNSEL:
HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, the undersigned authority in and for said county in said state, this day personally appeared W. Ramsey McKinney, 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 defendants 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.


W. Ramsey McKinney

Sworn to and subscribed before me
on this 28th day of February,
1968.


NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

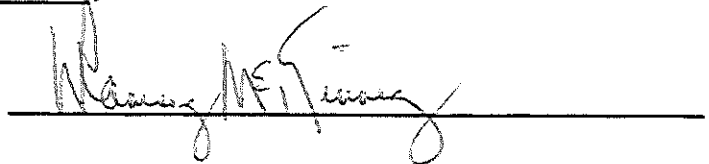
CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing interrogatories on Hayes and Boggs, Attorneys for Plaintiff, by depositing same in the United States mail, postage prepaid, addressed to said attorneys at their office in Spanish Fort, Alabama, on this, the 28th day of February, 1968.

FILED

FEB 29 1968

ALICE J. DUCK CLERK
REGISTER



STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Vernon M. Spears and Doxol Gas, Inc., a Corporation to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of George B. Clarke.

Witness my hand this the 2nd day of Jan., 1968.

Alice J. Duck
CLERK

GEORGE B. CLARKE

PLAINTIFF

VS

VERNON M. SPEARS and DOXOL
GAS, INC., a Corporation

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 7936

.....

I

The Plaintiff claims of the Defendants the sum of ONE-THOUSAND and NO/100 (\$1,000.00) DOLLARS, for that on to-wit, the 8th day of January 1967 at a point on U.S. Highway 98 five and three-tenths miles North of Fairhope, Alabama and 1524 feet West of Bell System Power Pole #68V, Defendants so negligently operated a motor vehicle as to cause or allow the same to collide with Plaintiff's automobile as a proximate result thereof Plaintiff's automobile was bent, broken and damaged, hence this suit.

W. L. Hays
Attorney for Plaintiff

FILED

JAN 2 1968

ALICE J. DUCK

CLERK
REGISTER

274

~~No Address~~

NUMBER: 7936

RECEIVED
JAN 2 1968

TAYLOR WILKINS
SHERIFF

GEORGE B. CLARKE,
PLAINTIFF

VS

VERNON M. SPEARS and DOXOL
GAS, INC., a Corporation

I hope DEFENDANT
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

JAN 2 1968

ALICE J. DUCK CLERK
REGISTER

SUMMONS and COMPLAINT

Received 2 day of Jan 1968
and on 6 day of Jan 1968
I served a copy of the within
on Doxol Gas Inc
I hope
Doxol Gas Inc
Mr. Spears Pres.
TAYLOR WILKINS, Sheriff
By Roy Randall D. S.

Received 2 day of Jan 1968
and on 6 day of Jan 1968
I served a copy of the within
on Vernon M. Spears
Alone I hope
TAYLOR WILKINS, Sheriff
By Roy Randall D. S.

Amount of money 140 multiple of
Total 14.00
TAYLOR WILKINS, Sheriff
By Roy Randall

W. Hayes

875

GEORGE B. CLARKE, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
v. : AT LAW
VERNON M. SPEARS and :
DOXOL GAS, INC., :
a corporation, :
Defendants. : CASE NO. 7936

A N S W E R

Comes now each of the defendants, separately and severally, and for answer to the plaintiff's complaint, and to each and every count thereof, separately and severally, sets down and assigns the following separate and several pleas, separately and severally:

I

That the material allegations are untrue.

II

Not guilty.

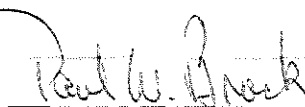
III

The defendants say that at the time and place complained of, the plaintiff was himself guilty of negligence which proximately contributed to the alleged damage to his motor vehicle in that at said time and said place he so negligently operated his said motor vehicle as to cause or allow the same to collide with the motor vehicle operated by Vernon M. Spears, wherefore, the plaintiff ought not to recover.

IV

The defendants claim of the plaintiff, in recoupment, the sum of ONE THOUSAND AND NO/100 (\$1,000.00) DOLLARS,

as damages, for that on, to-wit, the 8th day of January, 1967, at a point on U. S. Highway 98, approximately 3/10ths of a mile north of Fairhope, Alabama, which is a public highway in the County of Baldwin, State of Alabama, the plaintiff so negligently operated a motor vehicle as to cause or allow said motor vehicle to collide with a motor vehicle, the property of the defendant Doxol Gas, Inc., which was being operated by the defendant Vernon M. Spears at said time and at said place, and as a direct and proximate result and consequence of the aforesaid negligence on the part of the plaintiff, said motor vehicle operated by the defendant Vernon M. Spears was bent, broken and damaged and the use thereof was lost for a considerable period of time.



Paul W. Brock



W. Ramsey McKinney
Attorneys for Defendants
First National Bank Building
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE,
GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

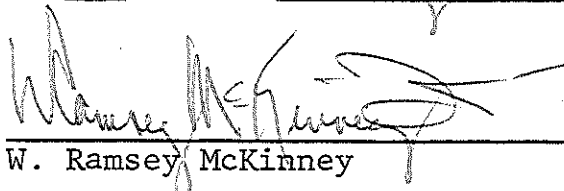
I hereby certify that I have served a true and correct copy of the foregoing Answer on Hayes and Boggs, attorneys for plaintiff, by depositing same in the United States mail addressed to said attorneys at their office in Spanish Fort, Alabama, on this, the 12th day of February, 1968.

FILED

FEB 5 1968

ALICE J. DUCK

CLERK
REGISTER



W. Ramsey McKinney

GEORGE B. CLARKE,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
VERNON M. SPEARS and)	
DOXOL GAS, INC.,)	
a corporation,)	
Defendants.)	CASE NO. 7936

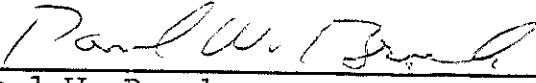
DEFENDANTS' AMENDMENT TO ANSWER


Comes now each of the defendants, separately and severally, and amends Plea IV of their answer to the plaintiff's complaint previously filed herein, so that the same shall now read as follows:

IV

The defendants claim of the plaintiff, in recoupment, the sum of ONE THOUSAND and No/100 (\$1,000.00) DOLLARS, as damages, for that on, to-wit, the 8th day of January, 1967, at a point on U. S. Highway 98, approximately five and 3/10ths miles north of Fairhope, Alabama, which is a public highway in the County of Baldwin, State of Alabama, the plaintiff so negligently operated a motor vehicle as to cause or allow said motor vehicle to collide with a motor vehicle, the property of the defendant Doxol Gas, Inc., which was being operated by the defendant Vernon M. Spears at said time and at said place, and as a direct and proximate result and consequence of the aforesaid negligence on the part of the plaintiff, said motor vehicle operated by the defendant Vernon M. Spears was

bent, broken and damaged and the use thereof was lost
for a considerable period of time.


Paul W. Brock

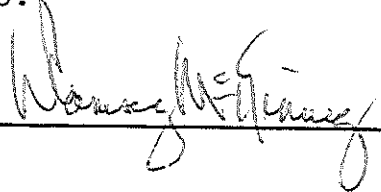

W. Ramsey McKinney
Attorneys for Defendants
First National Bank Building
Mobile, Alabama

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct
copy of the foregoing Amended Answer on Hayes and Boggs,
Attorneys for Plaintiff, by depositing same in the United
States mail, postage prepaid, addressed to said attorneys
at their office in Spanish Fort, Alabama, on this, the
28th day of February, 1968.



FILED

FEB 29 1968

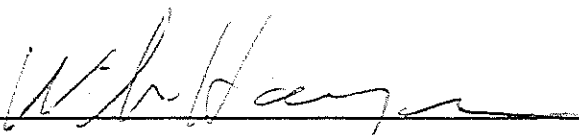
ALICE J. DUCK CLERK
REGISTER

GEORGE B. CLARKE : IN THE CIRCUIT COURT OF
PLAINTIFF : BALDWIN COUNTY, ALABAMA
VS : AT LAW
VERNON M. SPEARS AND :
DOXOL GAS, INC., :
A CORPORATION :
DEFENDANTS : CASE NO. 7936

COMES NOW THE PLAINTIFF IN THE ABOVE STYLED CAUSE AND FOR
REPLICATION TO DEFENDANT'S PLEA IN RECOUPMENT, SAYS AS FOLLOWS:

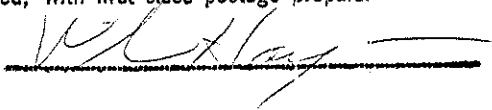
THE PLAINTIFF SAYS:

NOT GUILTY.


HAYES AND BOGGS, ATTORNEYS FOR DEFENDANTS
BY WILSON HAYES

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 9th day of February,
1968, served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, with first class postage prepaid.



FILED


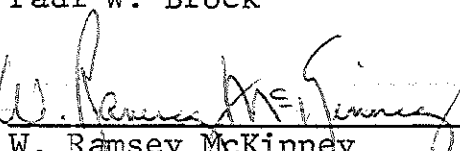
FEB 12 1968

ALICE J. DUCK CLERK
REGISTER

GEORGE B. CLARKE,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
vs.	:	AT LAW
VERNON M. SPEARS and	:	
DOXOL GAS, INC., a	:	
corporation,	:	
Defendants.	:	CASE NO. 7936

WITHDRAWAL OF MOTION

Comes now each of the defendants, Vernon M. Spears and Doxol Gas, Inc., separately and severally, and withdraws the "Motion to Require Answers to Interrogatories" heretofore filed herein.

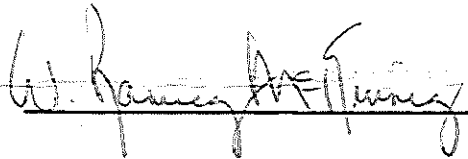

 Paul W. Brock

 W. Ramsey McKinney
 Attorneys for Defendants

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing to Hayes and Wilkins, Attorneys for Plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorneys at their office at Bay Minette, Alabama, on this, the 14th day of August, 1968.



FILED

AUG 15 1968

ALICE J. BRYANT