

JAMES WILLIAM CARAWAY,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
	X	AT LAW
JOHNNY HENDERSON and	X	
ALBERT BISHOP,	X	
Defendants.	X	

INTERROGATORIES PROPOUNDED BY THE PLAINTIFF
TO THE DEFENDANT, JOHNNY HENDERSON

Comes now the Plaintiff, by his attorneys, and affidavit having been made by John E. Chason, one of the attorneys of record for the Plaintiff, and propounds the following interrogatories to the Defendant, Johnny Henderson:

1. Please state your name and address.
2. Do you own a 1968 Dodge log truck?
3. If your answer to question "2" is in the affirmative, was this truck involved in an accident August 12, 1968 near Stapleton?
4. If your answer to the last preceding question is in the affirmative, was said truck driven at said time by Albert Bishop?
5. If your answer to the last preceding question is in the affirmative, was Albert Bishop, at said time and place, your agent, servant or employee?
6. If your answer to the last preceding question is in the affirmative, was Albert Bishop at said time and place, acting within the line and scope of his authority as such agent, servant or employee?

7. Please state the nature of Albert Bishop's business
at said time and place.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

FILED

FEB 7 1969

ALICE J. BOOK CLERK
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Julia W. Brock, a Notary Public,
in and for said County in said State, personally appeared John
E. Chason, who is known to me, and who, after being by me first
duly and legally sworn, did depose and say under oath as follows:

That his name is John E. Chason, and that he is one of
the Attorneys of Record for James William Caraway, who is the
Plaintiff in that certain action now pending in the Circuit Court
of Baldwin County, Alabama, wherein James William Caraway is the
Plaintiff and Johnny Henderson and Albert Bishop are the Defendants.
That the answer to the Interrogatories propounded above will be
material testimony and evidence for the Plaintiff in the said
cause.

Dated this 7th day of February, 1969.

John E. Chason
John E. Chason

Sworn to and subscribed before me this
7th day of February, 1969.

Julia W. Brock
Notary Public, Baldwin County, Alabama.

FILED

FEB 7 1969

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Johnny Henderson and Albert Bishop 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 James William Caraway.

Witness my hand this 7 day of February, 1969.

Deane L. ...
Clerk

JAMES WILLIAM CARAWAY,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

X

JOHNNY HENDERSON and
ALBERT BISHOP,

X

AT LAW

X

Defendants.

X

70-8563

The Plaintiff claims of the Defendants the sum of Six Hundred Dollars (\$600.00) damages for that heretofore, on, to-wit: the 12th day of August, 1968, at approximately 11:55 A. M. at a point on U. S. Highway No. 31 approximately 2.4 miles South of Stapleton in Baldwin County, Alabama, the Defendant, Albert Bishop, who was at said time and place the agent, servant or employee of the Defendant, Johnny Henderson, acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle as to cause or allow the same to run into,

upon or against a vehicle belonging to the Plaintiff and as a proximate result of such negligence, the Plaintiff's vehicle was damaged in that its right front fender, its right cowl, the hood, the right door, the right side panel and the radiator were bent, damaged or broken, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

Defendants' Addresses:

Albert Bishop
P. O. Box 71
Bay Minette, Alabama

Johnny Henderson
410 East Mango Street
Bay Minette, Alabama

FILED

FEB 7 1969

ALICE J. DUCK CLERK
REGISTER

no. 4563

Received 7 day of Feb 1969
and on 17 day of Feb 1969
I served a copy of the within J & C Interrog
on Johnny Henderson
Albert Bishop
By service on _____

TAYLOR WILKINS, Sheriff
By W A Bell D. S.

Sheriff claims 0 miles at
Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff
BY _____ DEPUTY SHERIFF

JAMES WILLIAM CARAWAY,
Plaintiff,

VS,

JOHNNY HENDERSON and ALBERT
BISHOP,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

1. SUMMONS AND COMPLAINT

* * * * *

2. Interrogatories
FILED

FEB 7 1969

CHASON, STONE & CHASON
ATTORNEYS AT LAW REGISTER
P. O. Box 120
BAY MINETTE, ALABAMA