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STATE OF ALABAMA	I	IN THE CIRCUIT COURT OF
VS.	I	BALDWIN COUNTY, ALABAMA.
JAMES C. McDONALD,	I	LAW SIDE. NO. _____.
DEFENDANT		

State of Alabama
 Baldwin County

To Denton Gibbes, % Welch & Cooper, Attorneys-at-Law, of Laurel,
 State of
 Jones County, Mississippi, Greeting:

Know Ye, That we, reposing confidence in your integrity, skill and ability, have appointed you Commissioner to take the testimony of Otis Bryant, Annola Thomas, Charles Hall and J. W. Thomas, material witnesses for the defendant in a cause now pending in the Circuit Court of Baldwin County, Alabama, wherein The State of Alabama is the prosecutor and James C. McDonald, is the defendant, and we hereby authorize and empower you to call and cause to come before you Otis Bryant, Annola Thomas, Charles Hall and J. W. Thomas, the said witnesses, and the deposition of each of them on oath to take, as well for the prosecutor as for the defendant touching his or her knowledge of the matters and things in controversy in said suit, which said depositions, when so taken shall be signed by each of said witnesses and certified by you as Commissioner acting herein; and you are further commanded, the deposition, when so taken, with this commission, to return under your hand and seal to the Clerk of said Court, with all convenient speed.

Witness my hand this the 21st day of March, 1950.

W. J. Welch
 Clerk

STATE OF ALABAMA

VS.

JAMES C. McDONALD,

DEFENDANT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE. NO. _____.

INTERROGATORIES to be propounded to J. W. Thomas who is a resident citizen of Laurel, Mississippi, and whose address is: % Western Geophysical Company, Laurel, Mississippi, and who is a material witness on behalf of the Defendant and whose deposition when taken will be offered in evidence on trial of the said cause.

INTERROGATORY No. One: What is your name, age and occupation?

INTERROGATORY No. Two: Are you acquainted with James C. Or Jimmie McDonald? If you state that you are acquainted with him how long have you known him?

INTERROGATORY No. Three: Did he work with you from December 4, 1948, to July 14, 1949, and if so where were you working?

INTERROGATORY No. Four: What type of work did he do?

INTERROGATORY No. Five: Do you know of your own personal knowledge whether or not during said period of time he sent money to his family at Bay Minette, Alabama.

INTERROGATORY No. Six: Do you know when he lost the job he had for the company with which you work?

INTERROGATORY No. Seven: Please state whether or not he got a job offered to him by the Dodd Drilling Company the next day.

INTERROGATORY No. Eight: Please state whether or not he was required to wait until certain machinery came in before going on his job.

INTERROGATORY No. Nine: Please state whether or not he waited for the machinery to come from July 14, 1949, to September 24, 1949.

INTERROGATORY No. Ten: Please state whether he worked from September 24, 1949, to the latter part of October, 1949, or the 1st of November, 1949.

Frank B. Hume
Attorney for Defendant

Defendant suggests the name of Honorable Denton Gibbes, Attorney-at-Law, % ~~Wetch~~ & Cooper, Laurel, Mississippi, as a suitable person to take the deposition of the above named witness.

Frank B. Hume
Attorney for Defendant

STATE OF ALABAMA

VS.

JAMES C. McDONALD,

DEFENDANT

Y

Y

Y

Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

LAW SIDE. NO. _____.

INTERROGATORIES to be propounded to Annola Thomas who is a resident citizen of Laurel, Mississippi, and whose address is: % Western Geophysical Company, Laurel, Mississippi, and who is a material witness on behalf of the Defendant and whose deposition when taken will be offered in evidence on trial of the said cause.

INTERROGATORY No. One: What is your name, age and occupation?

INTERROGATORY No. Two: Do you know the Defendant, James C. or Jimmie McDonald?

INTERROGATORY No. Three: How long have you known him?

INTERROGATORY No. Four: Did he work with your husband from December, 1948 to July 14, 1949?

INTERROGATORY No. Five: Did you during this period send any money for him to his family at Bay Minette, Alabama? If so please state the amounts you sent and if you have them please attach any postal note or money order receipts to your interrogatories.

INTERROGATORY No. Six: Did you have knowledge of about what the checks he received for his work amounted to each pay day and whether he sent money to his family from each pay check during the time you were with him?

INTERROGATORY No. Seven: Please state any other facts you know about James C. McDonald, the times he worked and the amount he sent to his family for support.

Frank B. Harrel

Attorney for Defendant

Defendant suggests the name of Honorable Denton Gibbs, Attorney-at-Law, % ~~Walt~~ & Cooper, Laurel, Mississippi, as a suitable person to take the deposition of the above named witnesses.

Frank B. Harner

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LAUREL, MISSISSIPPI

FILED
MAR 17 1950
ALICE J. BURK, Clerk

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STATE OF ALABAMA

VS.

JAMES C. McDONALD,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE. NO. _____.

INTERROGATORIES to be propounded to Charles Hall who is a resident citizen of Laurel, Mississippi, and whose address is: % Western Geophysical Company, Laurel, Mississippi, and who is a material witness on behalf of the Defendant and whose deposition when taken will be offered in evidence on trial of the said cause.

INTERROGATORY No. One: What is your name, age and address?

INTERROGATORY No. Two: Did you formerly live in Bay Minette, Alabama?

INTERROGATORY No. Three: Have you since December 4, 1948, worked with Jimmie or James C. McDonald?

INTERROGATORY No. Four: Did he regularly work from December, 1948, up to and including the 14th day of July, 1949?

INTERROGATORY No. Five: Did he lose his job about that time?

INTERROGATORY No. Six: Did he obtain a job the next day?

INTERROGATORY No. Seven: Was he required to wait until certain machinery came in before entering upon the duties of his new job?

INTERROGATORY No. Eight: Please state if you know about when he went to work on his new job.

Frank B. Harner

Attorney for Defendant

Defendant suggests the name of Honorable Denton Gibbes, Attorney-at-Law, % ~~Welch~~ & Cooper, Laurel, Mississippi, as a suitable person to take the deposition of the above named witness.

Frank B. Harner

Attorney for Defendant

ALICE J. BUCK, Clerk
MAR 17 1950
FILED

RECORDED AND INDEXED

THE STATE OF CALIFORNIA
COUNTY OF ALBANY
I, ALICE J. BUCK, Clerk of the County of Albany, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files of the County Clerk.

ALICE J. BUCK, Clerk

THE STATE OF CALIFORNIA
COUNTY OF ALBANY
I, ALICE J. BUCK, Clerk of the County of Albany, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files of the County Clerk.

THE STATE OF CALIFORNIA
COUNTY OF ALBANY
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THE STATE OF CALIFORNIA
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COUNTY OF ALBANY
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THE STATE OF CALIFORNIA
COUNTY OF ALBANY
I, ALICE J. BUCK, Clerk of the County of Albany, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files of the County Clerk.

DEED
ALICE J. BUCK
CLERK

ALICE J. BUCK
CLERK

STATE OF ALABAMA

VS.

JAMES C. McDONALD,
DEFENDANT

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X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
LAW SIDE. NO. _____

INTERROGATORIES to be propounded to Otis Bryant who is a resident citizen of Laurel, Mississippi, and whose address is: % Western Geophysical Company, Laurel, Mississippi, and who is a material witness on behalf of the Defendant and whose deposition when taken will be offered in evidence on trial of the said cause.

INTERROGATORY No. One: What is your name, age and address?

INTERROGATORY No. Two: Have you since December 4, 1948, worked with Jimmie or James C. McDonald?

INTERROGATORY No. Three: Did he regularly work from December, 1948, up to and including the 14th day of July, 1949?

INTERROGATORY No. Four: Did he lose his job about that time?

INTERROGATORY No. Five: Did he obtain a job the next day?

INTERROGATORY No. Six: Was he required to wait until certain machinery came in before entering upon the duties of his new job?

INTERROGATORY No. Seven: Please state if you know about when he went to work on his new job.

Frank B. Harris
Attorney for Defendant

Defendant suggests the name of Honorable Denton Gibbes, Attorney-at-Law, % ~~Worsh~~ & Cooper, Laurel, Mississippi, as a suitable person to take the deposition of the above named witness.

Frank B. Harris
Attorney for Defendant

NOTICE OF DEPOSITION
JULY 15 1949
BALDWIN COUNTY, ALABAMA

FILED
MAR 17 1950
ALICE J. BUCK, Clerk

RECEIVED FOR DEPOSIT
MAR 17 1950

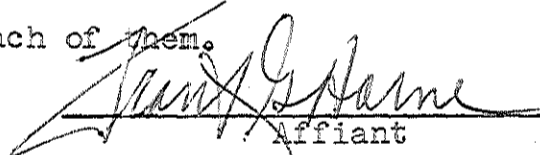
THE STATE OF TEXAS, COUNTY OF DALLAS, ss. I, ALICE J. BUCK, Clerk of the County, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears from the records of the County of Dallas, Texas, this 17th day of March, 1950.

ALICE J. BUCK, Clerk
COUNTY CLERK

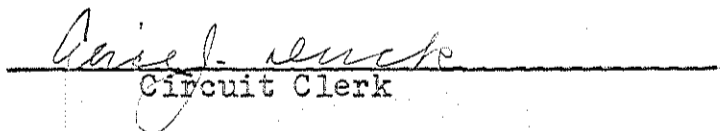
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority in and for said State and County, personally appeared Frank G. Horne, who is known to me and known to me to be the attorney of record for James C. McDonald in that certain cause now pending in the Circuit Court of Baldwin County, Alabama, wherein the State of Alabama is the prosecutor and James C. McDonald is the defendant, and who being by me first duly sworn says that Otis Bryant, Annola Thomas, Charles Hall and J. W. Thomas each are material witnesses for the defendant and that they each reside out of the State of Alabama and reside at Laurel, Mississippi, and whose addresses are: % Western Geophysical Company, Laurel, Mississippi, and that the defense of defendant, or a material part thereof depends exclusively upon the testimony of said witnesses, and each of them.


Affiant

Sworn to and subscribed before me this the 21st day of March, 1950.


Circuit Clerk

THE STATE OF MISSISSIPPI,)
)
COUNTY OF JONES,)
)
SECOND JUDICIAL DISTRICT.)
Answers to Interrogatories
Propounded to J. W. Thomas.

This day personally appeared before me, the undersigned authority in and for the jurisdiction aforesaid, J. W. THOMAS, who, having first been duly sworn by me, did depose and on his oath state:

ANSWER to INTERROGATORY No. One: I am J. W. Thomas; I am 34 years of age; I do seismograph work with Western Geophysical Company.

ANSWER TO INTERROGATORY No. Two: Yes; I have known him about fifteen months.

ANSWER TO INTERROGATORY No. Three: Yes; we worked about one month at Bay Minette, Alabama; then about three months at Laurel, Mississippi; and then about two weeks at Elk City, Oklahoma.

ANSWER TO INTERROGATORY No. Four: Drill helper on a seismograph drill.

ANSWER TO INTERROGATORY No. Five: Yes, he did.

ANSWER TO INTERROGATORY No. Six: About July 14th, 1949.

ANSWER TO INTERROGATORY No. Seven: I do not know of my own knowledge. I do know that he did not go to work the next day for them.

ANSWER TO INTERROGATORY No. Eight: Yes, he told me that.

ANSWER TO INTERROGATORY No. Nine: He worked part time for other people after July 14th, 1949, but he did go to work for Dodd when the drill came in. That was late in September, 1949.

ANSWER TO INTERROGATORY No. Ten: Yes.

J. W. Thomas

J. W. Thomas.

Sworn to and subscribed before me, this the 25th day of March, 1950.

C. Stanton Gibbs, Jr.
Notary Public.

THE STATE OF MISSISSIPPI,)
COUNTY OF JONES,)
SECOND JUDICIAL DISTRICT.)

Answers to Interrogatories
Propounded to Annola Thomas.

This day personally appeared before me, the undersigned authority in and for the jurisdiction aforesaid, ANNOLA THOMAS, who, having first been duly sworn by me, did depose and on her oath state:

ANSWER TO INTERROGATORY No. One: I am Annola Thomas; I am 31 years of age; I am a housewife.

ANSWER TO INTERROGATORY No. Two: Yes.

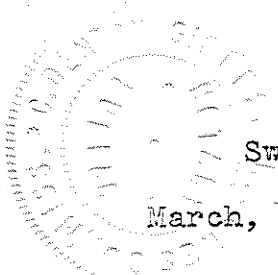
ANSWER TO INTERROGATORY No. Three: Fifteen months.

ANSWER TO INTERROGATORY No. Four: Yes, he did.

ANSWER TO INTERROGATORY No. Five: Yes, I did. Once I sent \$75.00 from Laurel, Miss., and at five or six other times I sent \$50.00 each time to his family from Laurel, Miss., and from Elk City, Oklahoma. I do not have the receipts, but I sent the money by postal money order. I gave the receipts to James C. McDonald.

ANSWER TO INTERROGATORY No. Six: He received about \$225.00 per month; I know that he sent money to his family out of each pay check while we were in Laurel and in Elk City.

ANSWER TO INTERROGATORY No. Seven: Opal Rogers, the wife of another man on the crew, sent the money for McDonald to his family twice. I do not know how much she sent, but I saw her mail it.


Annola Thomas
Annola Thomas.

Sworn to and subscribed before me, this the 25th day of
March, 1950.

My Commission Expires September 14, 1952

C. Denton Gibbs, Jr.
Notary Public.

THE STATE OF MISSISSIPPI,)
)
COUNTY OF JONES,)
)
SECOND JUDICIAL DISTRICT.)

Answers to Interrogatories
Propounded to Charles Hall.

This day personally appeared before me, the undersigned authority in and for the jurisdiction aforesaid, CHARLES HALL, who, having first been duly sworn by me, did depose and on his oath state:

ANSWER TO INTERROGATORY No. One: I am Charles Hall; I am 22 years of age; my address is c/o Western Geophysical Co., Laurel, Mississippi.

ANSWER TO INTERROGATORY No. Two: Yes.

ANSWER TO INTERROGATORY No. Three: I worked with him from January 6, 1949, to July 14, 1949.

ANSWER TO INTERROGATORY No. Four: Yes, he did.

ANSWER TO INTERROGATORY No. Five: Yes, he did.

ANSWER TO INTERROGATORY No. Six: Not to my knowledge.

ANSWER TO INTERROGATORY No. Seven: I was told by him that he had a job but could not go to work until some machinery came in.

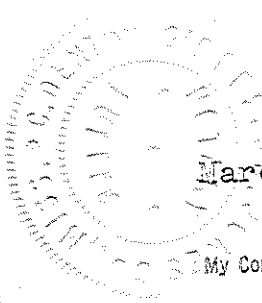
ANSWER TO INTERROGATORY No. Eight: Sometime in the last half of September, 1949.

Charles Hall
Charles Hall.

Sworn to and subscribed before me, on this the 25th day of March, 1950.

My Commission Expires September 14, 1952

C. Denton Gibbs, Jr.
Notary Public.



THE STATE OF MISSISSIPPI,)
COUNTY OF JONES,)
SECOND JUDICIAL DISTRICT.)

Answers to Interrogatories
Propounded to Otis Bryant.

This day personally appeared before me, the undersigned authority in and for the jurisdiction aforesaid, OTIS BRYANT, who, having first been duly sworn by me, did depose and on his oath state;

ANSWER TO INTERROGATORY No. One: I am William Otis Bryant; I am 33 years of age; my present address is 321 Pine St., Laurel, Mississippi.

ANSWER TO INTERROGATORY No. Two: Yes, I have.

ANSWER TO INTERROGATORY No. Three: Yes, he did.

ANSWER TO INTERROGATORY No. Four: Yes, he did.

ANSWER TO INTERROGATORY No. Five: Not to my knowledge.

ANSWER TO INTERROGATORY No. Six: He worked part time but was waiting for a drill to come in so he could go to work on a regular job which was promised him.

ANSWER TO INTERROGATORY No. Seven: Sometime late in September, 1949.

Otis Bryant
Otis Bryant.

Sworn to and subscribed before me, this the 25th day of March, 1950.

My Commission Expires September 14, 1952

C. Newton Gibbs, Jr.
Notary Public.

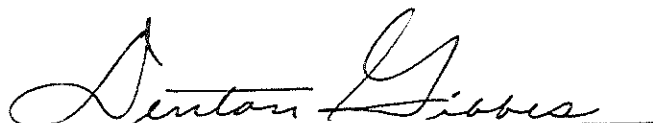
THE STATE OF MISSISSIPPI,)
COUNTY OF JONES,)
SECOND JUDICIAL DISTRICT.)

Certificate of Commissioner.

The undersigned, DENTON GIBBES, the commissioner named in the commission hereto attached, does by these presents certify that Otis Bryant, Annola Thomas, Charles Hall and J. W. Thomas, are to him known to be the same persons named in said commission; that Otis Bryant, Annola Thomas, Charles Hall and J. W. Thomas were by him first duly sworn to speak the truth, the whole truth and nothing but the truth, and then examined in the manner and as required by law, and that the answers of the said Otis Bryant, Annola Thomas, Charles Hall and J. W. Thomas were by him reduced to writing, as near as may be, in the language of the said Otis Bryant, Annola Thomas, Charles Hall and J. W. Thomas, and was subscribed by each of them in the presence of the undersigned DENTON GIBBES on the 25th day of March, 1950, at 4:00 o'clock p.m., in the City of Laurel, Mississippi.

And the undersigned further certifies that he is not of counsel nor of kin to any of the parties to this suit, nor is he in any way interested in the result of said cause.

Witness the hand of said commissioner on this the 25th day of March, 1950.


Denton Gibbs, Commissioner.

FILED
MAR 28 1950
ALICE J. DUCK, Clerk

FILED
MAR 28 1950
ALICE J. DUCK, Clerk

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