

1490

INTERROGATORIES

A. J. PICOU, PLAINTIFF : IN THE CIRCUIT COURT OF
VS. : BALDWIN COUNTY, ALABAMA.
JAMES C. AUSTIN, DEFENDANT. : AT LAW.

INTERROGATORIES to be and propounded to A. J. Picou who is a resident of Ponchatoula, Louisiana, who is a material witness in the case of A. J. Picou, Plaintiff, vs. James C. Austin, Defendant, and whose deposition when taken will be offered in evidence on trial of said cause.

INTERROGATORY No. 1. What is your name, age and residence?

INTERROGATORY No. 2. Are you the Plaintiff in this case?

INTERROGATORY No. 3. Were you the owner of a 1949 Ford 4 door sedan involved in a collision on U. S. Highway number 90 about, to-wit, three miles North of Robertsdale, Baldwin County, Alabama, on, to-wit, the 23rd day of October, 1949?

INTERROGATORY No. 4. Are you familiar with the fair and reasonable market value of automobile of the above make and model?

INTERROGATORY No. 5. Do you know what the reasonable market value of your automobile was immediately before the accident?

INTERROGATORY No. 6. What was the reasonable market value of your automobile immediately before the accident?

INTERROGATORY No. 7. Do you know what the reasonable market value of your automobile was immediately after the accident?

INTERROGATORY No. 8. What was the reasonable market value of your automobile immediately after the accident?

INTERROGATORY No. 9. Was your automobile repaired after the accident?

INTERROGATORY No. 10. What was the cost of repair for damages done to your automobile as a result of the accident?

INTERROGATORY No. 11. Was the automobile after being repaired in as good a condition after the accident?

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

James P. McWhorter
ATTORNEY FOR PLAINTIFF

FILED
MAY 4 1951
ALICE J. DUCK, Register

condition after the accident?

INTERROGATORY NO. 11. Was the automobile after being repaired in as good a condition as a result of the accident?

INTERROGATORY NO. 12. What was the cost of repairs for damages done to your

INTERROGATORY NO. 13. Was your automobile repaired after the accident?

Immediately after the accident?

INTERROGATORY NO. 14. What was the reasonable market value of your automobile

automobile was immediately after the accident?

INTERROGATORY NO. 15. Do you know what the reasonable market value of your

immediately before the accident?

INTERROGATORY NO. 16. What was the reasonable market value of your automobile

automobile was immediately before the accident?

INTERROGATORY NO. 17. Do you know what the reasonable market value of your

of automobile of the above make and model?

INTERROGATORY NO. 18. Are you familiar with the bolt and reasonable market value

Motor Vehicle, Baldwin County, Alabama, on 10-1-1947, the first day of October, 1948?

in a collision on U. S. Highway number 90 north, to-wit, three miles north of

INTERROGATORY NO. 19. Were you the owner of a 1933 Ford V eight sedan involved

INTERROGATORY NO. 20. Are you the witness in this case?

INTERROGATORY NO. 21. What is your name, age and residence?

be offered in evidence on trial of said cause.

Witness, to James H. Warren, Defendant, and whose deposition when taken will

of Baldwin County, Alabama, the 10th day of October, 1948, at the Court House in Baldwin County, Alabama.

INTERROGATORY NO. 22. Do you know what the reasonable market value of your

INTERROGATORY NO. 23. What is your name, age and residence?

Witness, to James H. Warren, Defendant, and whose deposition when taken will

INTERROGATORY NO. 24. Do you know what the reasonable market value of your

INTERROGATORY NO. 25.

25

STATE OF ALABAMA

ESCAMBIA COUNTY

Before me, Bertie W Hale, a Notary Public in and for said State and County personally appeared Hugh Rozelle who being by me first duly sworn deposes and says: that he is one of the attorneys for the Plaintiff, A. J. Picou, in the case of A. J. Picou, Plaintiff, vs. James C. Austin, Defendant; that the said A. J. Picou, Plaintiff, whose testimony is to be taken is a non-resident of the State of Alabama, residing in Ponchatoula, Louisiana; that the said A. J. Picou is a material witness and his evidence to be secured by this deposition will be material evidence on the trial of this cause.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

Sworn to and subscribed before me this 3rd day of May, 1951.

Bertie W Hale
NOTARY PUBLIC
MY COMMISSION EXPIRES NOV. 5, 1952

The name of I. D. Pittman, Attorney at Law, Hammond, Louisiana, is suggested as a fit and suitable person to take down the answers to the foregoing interrogatories and it is requested that a commission issue to him for that purpose.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

FILED
MAY 4 1951
U.S. DISTRICT COURT
MOBILE, ALA.

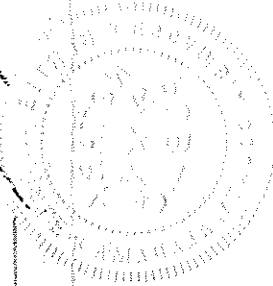
FILED
MAY 4 1951
ALICE J. QUICK, Register

Witness for Plaintiff
Frank R. Hays

Grand Jurors.

Going into the courtroom and if it is requested that a commission issue to him for
suggested as a fit and suitable person to take down the answers to the foregoing

The name of J. D. Pittman, Attorney at Law, Hammond, Louisiana, is



1951.

Sworn to and subscribed before me this 3rd day of May

Notary Public for Louisiana
Frank R. Hays

The chief of this case.

his evidence to be secured by this deposition will be material evidence on
Louisiana, Louisiana; that the said A. C. Wilson is a material witness and

now is to be taken in a non-residence of the State of Louisiana, residing in
James C. Martin, Louisiana; that the said A. C. Wilson, Louisiana, whose death-

for the Plaintiff, A. C. Wilson, in the case of A. C. Wilson, Louisiana, A.
he has first duly sworn before and says: that he is one of the attorneys
in and for said State and County personally appeared Edgar Bonafide who being
before me, Frank R. Hays, a Notary Public

EDGAR BONAFADE
STATE OF LOUISIANA

original marked
5-4-51

11

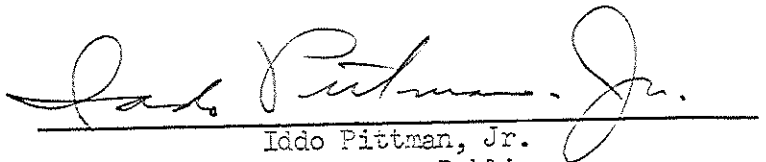
A. J. PICOU, PLAINTIFF	:	IN THE CIRCUIT COURT OF
VS.	:	BALDWIN COUNTY, ALABAMA.
JAMES C. AUSTIN, DEFENDANT.	:	AT LAW.


TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

AT LAW:

I, Iddo Pittman, Jr., a Notary Public in and for the Parish of Tangipahoa, State of Louisiana, authorized and empowered by law to administer oaths and to take the depositions of witnesses, do hereby certify that under and pursuant to the foregoing commission, issued by the above named Court, bearing date of May 4, 1951, I did appoint May 9, 1951, at the hour of 2 P. M. for the said witness, A. J. Picou of Ponchatoula, Louisiana, to come before me, and I did then and there examine him, upon his oath administered by me upon the Holy Evangelists, and reduced his answers to the interrogatories hereto annexed to writing; and that, thereafter, the said witness read over, subscribed, signed and swore to the same before me.

In witness whereof I have hereunto affixed my hand and set my seal of office at the City of Hammond, Parish of Tangipahoa, State of Louisiana, on this 9th day of May, 1951.


Iddo Pittman, Jr.
Notary Public


My commission is for life.

ANSWERS TO INTERROGATORIES

A. J. PICOU, PLAINTIFF : IN THE CIRCUIT COURT OF
VS. : BALDWIN COUNTY, ALABAMA.
JAMES C. AUSTIN, DEFENDANT. : AT LAW.

Personally appeared before me, I. D. Pittman, commissioner named in the attached commission, A. J. Picou, a material witness in above entitled cause and who being by me duly sworn deposes and says as follows: -

1. My name is A. J. Picou. I am over the age of twenty-one years. I am a resident of Ponchatoula, Louisiana.

2. Yes, I am the Plaintiff in this case.

3. Yes, I was the owner of the 1949 Ford 4 door sedan involved in a collision on U. S. Highway number 90 about, to-wit, three miles North of Robertsedale, Baldwin County, Alabama, on, to-wit, the 23rd day of October, 1949.

4. Yes, I am familiar with the fair and reasonable market value of automobiles of the make and model of my own.

5. Yes, I know what the reasonable market value of my automobile was immediately before the accident.

6. The reasonable market value of my automobile immediately before the accident was \$1900.00.

7. Yes, I know what the reasonable market value of my automobile was immediately after the accident.

8. The reasonable market value of my automobile immediately after the accident was \$1763.94.

9. Yes, my automobile was repaired after the accident.

10. The cost of repair for damages done to my automobile as a result of the accident was \$236.06.

11. No. my automobile after being repaired was not in as good condition after the accident.

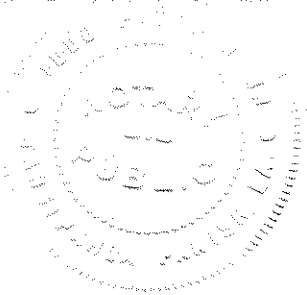

A. J. PICOU, PLAINTIFF

A. J. PICOU, PLAINTIFF : IN THE CIRCUIT COURT OF
VS. : BALDWIN COUNTY, ALABAMA.
JAMES C. AUSTIN, DEFENDANT. : AT LAW.

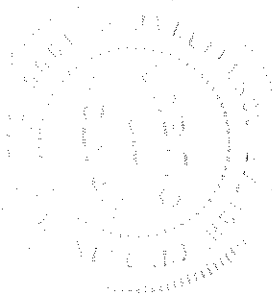
I, I. D. Pittman, the commissioner in the commission hereto attached named, do hereby certify that I am personally acquainted with the said witness, A. J. Picou, and know him to be the identical person named in said commission; that he was duly sworn by me to speak the truth, the whole truth and nothing but the truth, and examined as above stated, and that his evidence was taken down by me as near as might be in his own language and was subscribed by him in my presence on the 9th day of May, 1951, at my office in Hammond, Louisiana. I further certify that I am neither of counsel or of kin to any of the parties to this cause nor in any way interested in the result thereof.

Witness my hand and seal this 9 day of May, 1951.

I. D. Pittman Jr.
COMMISSIONER
my commission is for life



76011A90



FILED
MAY 10 1951
ALICE J. GUCK, Clerk

D1500

STATE OF ALABAMA

ESCAMBIA COUNTY

Before me, Bertie W. Hale, a Notary Public in and for said State and County personally appeared Hugh Rozelle who being by me first duly sworn deposes and says: that he is one of the attorneys for the Plaintiff, A. J. Picou, in the case of A. J. Picou, Plaintiff, vs. James C. Austin, Defendant; that the said A. J. Picou, Plaintiff, whose testimony is to be taken is a non-resident of the State of Alabama, residing in Ponchatoula, Louisiana; that the said A. J. Picou is a material witness and his evidence to be secured by this deposition will be material evidence on the trial of this cause.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

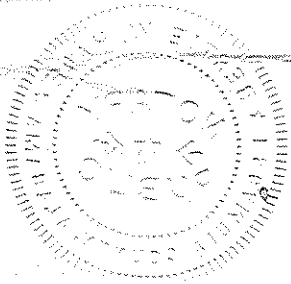
Sworn to and subscribed before me this 3rd day of May, 1951.

Bertie W. Hale
NOTARY PUBLIC
MY COMMISSION EXPIRES NOV. 5, 1952

The name of I. D. Pittman, Attorney at Law, Hammond, Louisiana, is suggested as a fit and suitable person to take down the answers to the foregoing interrogatories and it is requested that a commission issue to him for that purpose.

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

1490



HUGH ROZELLE
ATTORNEY-AT-LAW
2ND FLOOR BANK OF ATMORE BLDG.
ATMORE, ALABAMA

PHONES { 495-W
287

May 2, 1951

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

Re: A. J. Picou vs. James C.
Austin.

Dear Mrs. Duck:

I am enclosing herewith affidavit and interrogatories in connection with the above styled cause, and may I suggest the Honorable I. D. Pittman, Attorney at Law, Hammond, Louisiana, as being a fit and suitable person to take down the answers to the interrogatories and ask that a commission be issued to him for that purpose.

Sincerely,


Hugh Rozelle

ER:rp

SUBPOENA AND COMPLAINT

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS;

You are hereby commanded to summon James C. Austin 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 A. J. Picou.

Witness my hand this 27th day of April, 1950.

W. J. Welch
CLERK

A. J. PICOU,
Plaintiff

VS.

JAMES C. AUSTIN,
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

COMPLAINT.

1. The Plaintiff claims of the Defendant the sum of Two Hundred Thirty-six and 06/100 (\$236.06) as damages, for that, heretofore, on to-wit, October 23, 1949, the Plaintiff's automobile was being driven along and upon a public highway in Baldwin County, Alabama, to-wit, U. S. Highway Number 90, about, to-wit, three miles north of Robertsdale, Alabama, and that then and there the Defendant did negligently run the automobile he was driving into the Plaintiff's automobile, and as a direct and proximate consequence thereof the Plaintiff's automobile was damaged in the aforesaid sum, hence this suit.

2. The Plaintiff claims of the Defendant the sum of Two Hundred Thirty-six and 06/100 (\$236.06) as damages, for that, heretofore, on to-wit, October 23, 1949, the Plaintiff's automobile was being driven along and upon a public highway in Baldwin County, Alabama, to-wit, U. S. Highway Number 90, about three miles north of Robertsdale, Alabama, and that the Defendant did then and there wantonly injure the Plaintiff's automobile by wantonly running the automobile he was driving into the Plaintiff's automobile and as a direct and proximate consequence and result thereof Plaintiff's automobile was damaged in the amount aforesaid.

The Plaintiff further avers that the Defendant, James C. Austin, is and was on the date of said collision, to-wit, the 23rd day of October, 1949, a non-resident of the State of Alabama, and that his present Post Office address is James C. Austin, % Marstin-Quina Furniture Company, Pensacola, Florida, and the Plaintiff prays that service of process upon the Defendant, James C. Austin, may be had in accordance with the provisions of Code of 1940, Tit. 7, Section 199.

Hugh Rozelle
James P. McMurphy
Attorneys for Plaintiff

Plaintiff demands a trial by jury.

Hugh Rozelle
James P. McMurphy
Attorneys for Plaintiff

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA. LAW SIDE.

NO. 1490

A. J. PICOU,
PLAINTIFF

VS.

JAMES C. AUSTIN,
DEFENDANT.

FILED 4-28-50

W. J. French

Hugh Rozelle
James P. McMurphy
ATTORNEYS FOR PLAINTIFF
ATTORNEYS, ALABAMA

RECEIVED IN OFFICE

MAY 2 - 1950

G. A. MOSLEY, Sheriff

EXECUTED BY DELIVERING

2 copy of the within

To Supt Pool
Secretary of State
OF THE State of Ala
AND SAID Supt Pool
WAS SUCH WHEN SO SERVED

This the 5-3 1950

G. A. Mosley
Sheriff Montgomery County

By George
Deputy Sheriff

A. J. Picou, Plaintiff) IN THE CIRCUIT COURT
vs) OF
James C. Austin, Defendant) BALDWIN COUNTY, ALABAMA

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

I, Sibyl Pool, Secretary of State, hereby certify that on May 3, 1950 I sent by registered mail in an envelope addressed as follows:

"Mr. James C. Austin c/o Marstin-Quina Furniture Company Pensacola, Florida"	"Registered mail Return Receipt requested Deliver to addressee only"
--	--

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

"Mr. James C. Austin
c/o Marstin-Quina Furniture Company
Pensacola, Florida"

You will take notice that on May 3, 1950 the Sheriff of Montgomery County, Alabama served upon me, in my official capacity, summons and complaint in a case entitled A. J. Picou, Plaintiff vs James C. Austin, Defendant, in the Circuit Court of Baldwin County, Alabama, a true copy of which summons and complaint is attached hereto and the said service upon me as Secretary of State of the State of Alabama has the force and effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 3rd day of May, 1950.


Signed) Sibyl Pool
Sibyl Pool
Secretary of State

Enclosure - 1

I further certify that the notice above set out which was so mailed in the envelope addressed as above set forth had attached to it a true copy of the summons and complaint in the above styled cause, there being mailed in the envelope at the time shown the notice with copy of summons and complaint attached thereto.

I further certify that on the 8th, day of May 1950 I received the return card, showing receipt by the designated addressee of the said notice with attached summons and complaint aforesaid, which receipt I attach hereto.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 8th, day of May 1950.


Sibyl Pool
Secretary of State

Enclosure - 1



HUGH ROZELLE
ATTORNEY-AT-LAW
2ND FLOOR BANK OF ATMORE BLDG.
ATMORE, ALABAMA

PHONES { 495-W
287

April 26, 1950

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

Re: A.J. Picou vs. James C. Austin

Dear Mrs. Duck:

We are enclosing an original and two copies of
summons and complaint along with check in the amount of
\$ 3.00 and may we ask that service be had through the
Secretary of State in Accordance with Code 1940, Tit. 7,
Section 199.

Sincerely,

Hugh Rozelle

Hugh Rozelle

HR:lr

SIMMONS AND COMPLAINT

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA. GREETINGS;

You are hereby commanded to summon James C. Austin 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 A. J. Picou.

Witness my hand this 27 day of April, 1950.

W. J. Welch
CLERK

A. J. PICOU,
Plaintiff

VS.

JAMES C. AUSTIN,
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

COMPLAINT.

1. The Plaintiff claims of the Defendant the sum of Two Hundred Thirty-six and 06/100 (\$236.06) as damages, for that, heretofore, on to-wit, October 23, 1949, the Plaintiff's automobile was being driven along and upon a public highway in Baldwin County, Alabama, to-wit, U. S. Highway Number 90, about, to-wit, three miles north of Robertsdale, Alabama, and that then and there the Defendant did negligently run the automobile he was driving into the Plaintiff's automobile, and as a direct and proximate consequence thereof the Plaintiff's automobile was damaged in the aforesaid sum, hence this suit.

2. The Plaintiff claims of the Defendant the sum of Two Hundred Thirty-six and 06/100 (\$236.06) as damages, for that, heretofore, on to-wit, October 23, 1949, the Plaintiff's automobile was being driven along and upon a public highway in Baldwin County, Alabama, to-wit, U. S. Highway Number 90, about three miles north of Robertsdale, Alabama, and that the Defendant did then and there wantonly injure the Plaintiff's automobile by wantonly running the automobile he was driving into the Plaintiff's automobile and as a direct and proximate consequence and result thereof Plaintiff's automobile was damaged in the amount aforesaid.

The Plaintiff further avers that the Defendant, James C. Austin, is and was on the date of said collision, to-wit, the 23rd day of October, 1949, a non-resident of the State of Alabama, and that his present Post Office address is James C. Austin, % Marstin-Quinn Furniture Company, Pensacola, Florida, and the Plaintiff prays that service of process upon the Defendant, James C. Austin, may be had in accordance with the provisions of Code of 1940, Tit. 7, Section 199.

Hugh Rozelle

Attorneys for Plaintiff

Plaintiff demands a trial by jury.

Hugh Rozelle

Attorneys for Plaintiff

RECORDED

SUMMONS AND COMPLAINT
IN THE CIRCUIT COURT OF BALD
COUNTY, ALABAMA. LAW SIDE.

NO. 1490

A. J. PICOU,
PLAINTIFF

VS.

JAMES C. AUSTIN,
DEFENDANT.

FILED 4-27-50

Beige Leach
CLERK

Hugh Rozelle

ATTORNEYS FOR PLAINTIFF
ATMORE, ALABAMA

A. J. PICOU,

PLAINTIFF

VS

JAMES C. AUSTIN,

DEFENDANT

IN THE CIRCUIT COURT OF

WALDWIN COUNTY, ALABAMA

AT LAW.

Comes the Plaintiff in said cause and moves the court to reinstate said complaint which was erroneously dismissed for lack of prosecution and in support of said motion shows unto this Honorable Court:

That a Jury trial was demanded in said cause; and that at the Fall term of Court, 1951 this Honorable Court on Thursday preceding, dismissed the Jury for the Friday session without notice to the attorney for said cause, Honorable Hugh Roselle of Atmore; and that said case was not presented to Jury on that date; and that subsequent to that date your petitioner joined C. LeNoir Thompson as associate attorney in said cause; and that said attorney was in Washington on a case before the United States Court of Claims during the week of March 4, 1952; and that neither the attorney of record or his associate had any information concerning the action of this Court prior to information received during the past 15 days; and that said motion is being made within 30 days from the date notice of the action of this Honorable Court was received by an attorney for the Plaintiff.

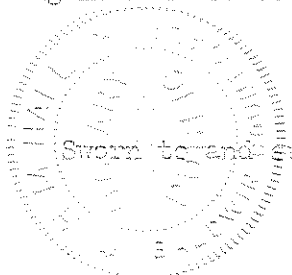
WHEREFORE this motion.

Attorneys for Plaintiff
Hugh Roselle
C. LeNoir Thompson

C. LeNoir Thompson

STATE OF ALABAMA
WALDWIN COUNTY

Before me the undersigned authority personally appeared C. L. Thompson one of the Attorneys for the Plaintiff in the above styled cause, and who being duly sworn deposes and says: That the facts alleged in the foregoing motion are true and correct.



Sworn to and subscribed before me this the 10th day of July, 1952.

C. LeNoir Thompson

[Signature]
Notary Public.

no 1420

A. J. DUCK,

PLAINTIFF

VS

JAMES C. AUSTIN

DEFENDANT

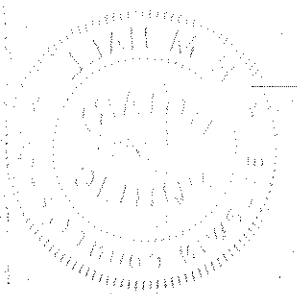
MOTION FOR RECESS

From the Law Offices of
C. LeNoir Thompson
Attorney At Law
Day Minette, Alabama

FILED

JUL 14 1952

ALICE J. DUCK, Clerk



IDDO PITTMAN, JR.

ATTORNEY-AT-LAW
GUARANTY BANK BLDG.
HAMMOND, LOUISIANA

May 9, 1951

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

Re: A. J. Picou vs. James A. Austin

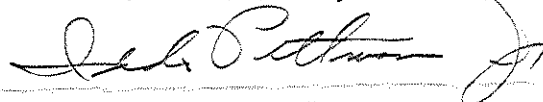
Dear Madam:

I am enclosing herewith the original commission, original interrogatories, original answers to interrogatories, and my certificate in the captioned matter.

If it is necessary to have a certificate of the Clerk of Court for this Parish to establish my authority to administer oaths I will be pleased to supply this item.

My bill for these services is \$15.00.

Very truly yours,



Iddo Pittman, Jr.

REGISTERED

Enclosures
IP:lb

1490

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Hon. J. H. Pittman, attorney at Law
Hammond, La.

KNOW YE: that we, having full faith in your prudence and competency, have appointed you
Commissioner, and by these presents do authorize you, at such time and place as you may appoint,
to call before you and examine A. J. Picou

Bonchatoula, La.

as witnesses in behalf of Plaintiff in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein

A. J. Picou

Plaintiff
Complainant

and James A. Austin

Respondent
Respondent

on oath, to be by you administered, upon his
to take and certify the deposition of the witness and return the same to our Court, with all
convenient speed, under your hand.

Witness 4th day of May, 1951.

Desire J. Leach
Register.

Commissioner's Fee, \$ 15⁰⁰

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Complainant—

vs.

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

INTERROGATORIES

A. J. PICOU, PLAINTIFF : IN THE CIRCUIT COURT OF
VS. : BALDWIN COUNTY, ALABAMA.
JAMES C. AUSTIN, DEFENDANT. : AT LAW.

INTERROGATORIES to be and propounded to A. J. Picou who is a resident of Ponchatoula, Louisiana, who is a material witness in the case of A. J. Picou, Plaintiff, vs. James C. Austin, Defendant, and whose deposition when taken will be offered in evidence on trial of said cause.

INTERROGATORY No. 1. What is your name, age and residence?

INTERROGATORY No. 2. Are you the Plaintiff in this case?

INTERROGATORY No. 3. Were you the owner of a 1949 Ford 4 door sedan involved in a collision on U. S. Highway number 90 about, to-wit, three miles North of Robertsedale, Baldwin County, Alabama, on, to-wit, the 23rd day of October, 1949?

INTERROGATORY No. 4. Are you familiar with the fair and reasonable market value of automobile of the above make and model?

INTERROGATORY No. 5. Do you know what the reasonable market value of your automobile was immediately before the accident?

INTERROGATORY No. 6. What was the reasonable market value of your automobile immediately before the accident?

INTERROGATORY No. 7. Do you know what the reasonable market value of your automobile was immediately after the accident?

INTERROGATORY No. 8. What was the reasonable market value of your automobile immediately after the accident?

INTERROGATORY No. 9. Was your automobile repaired after the accident?

INTERROGATORY No. 10. What was the cost of repair for damages done to your automobile as a result of the accident?

INTERROGATORY No. 11. Was the automobile after being repaired in as good a condition after the accident?

Hugh Rozelle
ATTORNEY FOR PLAINTIFF

James P. McMurphy
ATTORNEY FOR PLAINTIFF

ND1490

FILED

MAY 4 1951

ALICE J. BUCK, Register

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300
(GPO)

POSTMARK OF DELIVERING
OFFICE



Return to Secretary of State
(NAME OF SENDER)

Street and Number,
or Post Office Box,

REGISTERED ARTICLE
151443

No.

INSURED PARCEL

No.

MONTGOMERY,
ALABAMA

A. J. Picou vs. James C. Austin

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1

(Signature or name of addressee)

2

(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery

MAY - 5 1950

, 19

Handwritten: 37-10-50
Handwritten: Austin vs. Picou