

EDVALD LAWRENCE RASMUSSEN,	X	
	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
	X	
Vs.,	X	
	X	BALDWIN COUNTY, ALABAMA
HENRY GANEY and	X	
BETTY THOMLEY GANEY,	X	
	X	AT LAW
Defendants.	X	NO. _____

Come the Defendants in the above styled cause and propounds the following interrogatories to the Plaintiff, Edvald Lawrence Rasmussen:

1. State you name and address.
2. Are you the plaintiff in this cause?
3. State your age and the number of your drivers license.
4. State the name and address of the driver of the wrecker or wreckers who pulled your car back on the road.
5. State whether or not you ran into any object when you left the road.
6. State whether or not the wrecker or wreckers did any damage to your automobile at the time they removed it from the scene of the accident.
7. Since you have stated the left side of your vehicle was bent and torn, state what object caused the damage.
8. Since you stated the right rear door was bent, state what caused the damage.
9. Since you stated the wheels were knocked out of line, state whether the front or the back wheels were knocked out of line.
10. State what knocked the wheels out of line, both front and back.
11. Since you stated both bumpers were damaged, were not these damages caused by the wrecker or wreckers removing the vehicle from the scene of the accident?

12. State who was the driver of the said automobile of the defendant or defendants.

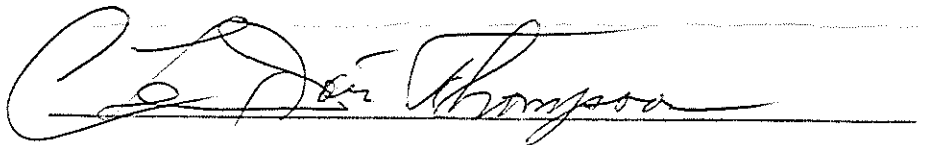
  
ATTORNEY FOR DEFENDANTS.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am the attorney of record for the defendants in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the plaintiff to the foregoing interrogatories will, if truthfully made, be material evidence for the defendants on the trial of said cause.



Sworn to and subscribed before me by the said C. LeNoir Thompson on this the 21<sup>st</sup> day of April, 1970.

  
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

NO. 9169

Evald Lawrence Rasmussen

VS

Henry Ganey

and

Betty Thomley Ganey

Interrogatories

Received 22 day of April 19 70  
and on 22 day of April 19 70

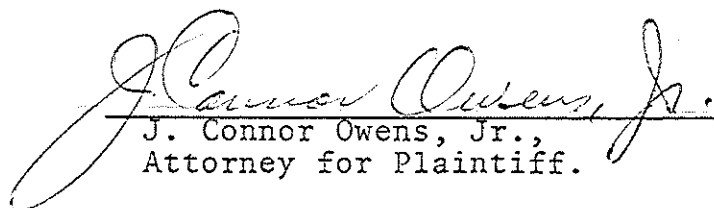
I served a copy of the within Interrogatories  
on J. Conrad Avers

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
Edward Wilkins D. S.

EDVALD LAWRENCE RASMUSSEN,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
HENRY GANEY and	)	
BETTY THOMLEY GANEY,	)	AT LAW.
Defendants.	)	9169

The Plaintiff claims of the Defendants, the sum of TWELVE HUNDRED DOLLARS (\$1200.00), for that heretofore, on, to-wit, October 1, 1969, at about 1:20 o'clock P. M., on a public road in Baldwin County, Alabama, known as Alabama Highway #47, at a point thereon approximately .2 of a mile South of the intersection of said Highway #47 with Interstate Highway 65, the Defendant, Betty Thomley Ganey, who was then and there an agent, servant or employee of Henry Ganey, acting within the line and scope of her employment as such, did so negligently operate an automobile, which she was then and there driving, so as to cause or allow said automobile to run into, upon or against the automobile which the Plaintiff was then and there driving, and as a proximate result and consequence of the negligence of the Defendant aforesaid, the Plaintiff's automobile was damaged in this: the left front side was bent and torn; the left front door was crushed; the right rear door was bent; the wheels were knocked out of line and both bumpers were damaged, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

  
 J. Connor Owens, Jr.,  
 Attorney for Plaintiff.

**FILED**

MAR 18 1970

**ALICE J. DUCK** CLERK  
 REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No.....

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon HENRY GANEY and BETTY THOMLEY GANEY

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint

filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette against.....

HENRY GANEY, ET AL.,

... Defendant.....

by EDVALD LAWRENCE RASMUSSEN

..... Plaintiff.....

Witness my hand this..... 18th ..... day of..... March ..... 19..... 70

*Alice J. Week* Clerk

24 3-19-70

No. 9169

Page.....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

**EDVALD LAWRENCE RASMUSSEN**

Plaintiffs

vs.

**HENRY GANEY and BETTY THOMLEY**  
**GANEY,**

Defendants

**SUMMONS AND COMPLAINT**

Filed 3/18/70 19.....

Clerk

**J. CONNOR OWENS, JR.**

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Pensacola, Fla.

Received In Office

March 19 1970

Sheriff

I have executed this summons

this March 30 1970  
by leaving a copy with

Betty J. Ganey  
Henry Ganey, Jr.

~~Sheriff's Office~~ 80 miles at  
~~Ten Cents per mile~~ Total \$ 8.00  
**TAYLOR WILKINS, Sheriff**  
By W. A. Zolbert  
**DEPUTY SHERIFF**

Taylor Wilkins Sheriff  
W. A. Zolbert Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

Lettie