

OPAL TYREE,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY,
vs.)	ALABAMA
DELA HARRIS, as Executrix)	AT LAW
of the Estate of MONROE)	
SLOAN, deceased,)	
Defendant.)	CASE NO. 9773

INTERROGATORIES TO THE PLAINTIFF

Comes now the defendant, DELA HARRIS, as Executrix of the Estate of MONROE SLOAN, deceased and, desiring the testimony of the plaintiff propounds 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. State the name and address of your employer at the time of the occurrence made the basis of this suit and the work you were doing.

3. Describe each and every injury received by you in the occurrence made the basis of this suit. (a) Describe and locate each and every laceration or cut you sustained in said occurrence. (b) Describe and locate each and every bruise, sprain, strain or contusion you sustained in said occurrence (c) Describe and locate each and every fracture or dislocation suffered by you in said occurrence. (d) Specify which, if any, of said injuries are permanent in nature, and state the manner and degree in which each said injury disables you. (e) Specify and describe in detail any and all other ailments resulting from said occurrence which have not already been enumerated by you, and state how and to what degree said condition manifests itself.

4. Give the name and address of each and every doctor, if any, who has attended you for the injuries you allege to have received in the occurrence made the basis of this suit. (a) Give the dates of treatment or examination of you by each and every said doctor, respectively. (b) What was your condition with reference to said injuries and ailments when you first attended by each of said doctors, separately and severally? (c) What was your condition with reference to said injuries and ailments when you were last attended by each of said doctors, separately and severally? (d) State the date on which you were last treated, examined or perscribed for by each of said doctors, separately and severally, and relate in substance what transpired at said time between you and each of said doctors, and include the substance of said doctor's instructions to you with reference to further treatment.

(e) State the amount of the bill, separately and severally, of each respective doctor for the treatment rendered you or services performed for you, resulting from the occurrence made the basis of this suit. (f) State which of said doctors, separately, have been paid, and, if so, by whom. (g) Were you referred to any of the doctors heretofore mentioned by you in your answers to these interrogatories by the attorney or attorneys who represent you and, if so, state the name or names of such doctors. (h) Did any of the doctors heretofore mentioned by you refer you to the attorney or attorneys who represent you and, if so, state which of said doctors did so.

5. State whether or not you were hospitalized as a result of the occurrence made the basis of this suit. (a) If so, give the name and address of said hospital where you were confined. (b) Give the dates of your confinement. (c) State the amount of the hospital bill incurred for your confinement. (d) State whether or not any portion of said bill was taken care of by hospitalization insurance or by any other form of protection, and, if so, what portion? (e) State who paid or became obligated to pay said hospital bill or portion thereof.

6. State whether or not any X-rays were taken of you as a result of the occurrence made the basis of this suit. (a) Give the name and address of every radiologist who took said X-rays or who supervised their taking and state when all said X-rays, respectively, were taken. (b) State each X-ray reading or your understanding of what each of the X-rays revealed, respectively. (c) Give the amount of each said X-ray bill, and state by whom each was paid.

7. State whether or not special nurses, registered nurses or practical nurses attended you in the treatment of the injuries you allege you received in the occurrence made the basis of this suit. (a) If so, give the name and address of each. (b) Give the dates you were attended by each of said nurses or practical nurses. (c) Give the amount of each of said nurse's bill, separately and severally. (d) State who paid said bills, and also whether your said expenses were taken care of by any form of medical insurance or protection.

8. State whether or not you incurred any ambulance bills, drug expense or miscellaneous expense of any nature whatsoever not already enumerated as a result of the occurrence made the basis of this suit. (a) Describe each of said expenses, separately and severally, stating the amount of each. (b) By whom were each of said expenses paid?

9. State how long you were confined to bed at home after, and as the result of, the occurrence made the basis of this suit, if you were so confined, and state the dates of said confinement. (a) State for how many days following your confinement to bed you were up and about your home. (b) State how many days elapsed from the date of the occurrence until you were able to leave your home and come to town or go other places. (c) State the number of days which elapsed from the date of said occurrence before you were able to resume your normal activities.

10. State whether or not, prior to the occurrence made the basis of this suit, you were ever at any time injured in any manner whatsoever to any extent. (a) If you were injured prior to the occurrence made the basis of this suit in any manner, please describe in detail how you were injured, giving the date of each such injury and the extent of each such injury. (b) Have you sustained any injuries of any nature whatsoever subsequently to the occurrence made the basis? (c) If so, describe the same fully and in detail. (d) Have you ever made claim or filed suit for any injury or damage arising out of any occurrence prior to the accident made the basis of this suit? (e) If so, state where each such occurrence happened, against whom each such claim was made and the outcome of each. (f) Give the name and address of each and every doctor who has treated or examined you during the five years next preceding the date of the occurrence made the basis of this suit. (g) Describe the condition for which you were so treated or examined.

11. Describe completely and in detail the vehicle involved in, and occurrpied, driven by or owned 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 the name and address of the driver of said vehicle on said occasion.

12. Describe completely and in detail every item of damage sustained by said motor vehicle on the occasion of said accident. (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.

13. State the number of persons occupying the motor vehicle in or on which you also were riding or which you were driving at the time of the accident made the basis of this suit, and state specifically how and in what manner said occupants were located in on said vehicle on said occasion. Give their names and addresses. (a) State fully the purpose of the trip you were making at the time of the accident made the basis of this suit. (b) From what point had you departed? (c) What was your destination? (d) Were you performing a mission, errand or duty for anybody whomsoever? If so, state the nature of same and the name and address of the person or company for whom you were performing it. (e) Give the name and address of each and every company or person whom had any interest whatsoever in the trip.

14. 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 and of any pedestrain after the accident. (c) Where you were located when you first saw the defendant's vehicle or other vehicle involved in the accident. (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.

15. State whether or not the accident made the basis of this suit occurred at an intersection of streets or avenues, and, if so, then state: (a) At what intersection of streets or avenues 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) State how far you, in your judgment, could then see to the left and right on each of the streets entering the intersection and down each of the intersecting streets when you approach at a point 50 feet from said intersection immediately prior to said accident. (d) 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. (e) 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.

16. 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 street on which defendant's motor vehicle was traveling? (h) Where did the impact occur with reference to the right edge of the street on which defendant's motor vehicle was traveling? (i) How far distant were you from the nearest intersection when the impact occurred?

17. State specifically and in detail exactly how the accident made the basis of this suit occurred and describe chronologically the events that occurred leading up to the same as seen by you. (a) If you were a passenger in a vehicle involved in this accident, describe each and everything done by the operator of the said vehicle in which you were riding to avoid said accident. (b) Describe each and everything which the driver of the defendant's motor vehicle failed to do to avoid said accident. (c) Describe each and everything done by the driver of defendant's motor vehicle immediately prior to and at the time of said accident. (d) State each and everything done by you immediately prior to said accident.

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

(c) If you were an occupant of a vehicle involved in the accident made the basis of this suit, state whether either you or the driver of the vehicle (if different persons) in which you were riding pleaded guilty to a charge of reckless driving or of driving while intoxicated arising from said accident. If so, when and in what court was this done?

19. 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.

20. 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, and width of each of said streets or highways. (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 also the four corners of same 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. (c) If you were a passenger, then state at what point had the motor vehicle in which you were riding entered the street upon which you were traveling at the time of the said accident?

21. State fully, specifically and in detail each and every act or thing done by the operator of the vehicle occupied or driven by you at the time of the accident made the basis of this suit during the last 100 feet of said vehicle's approach to the point of said collision, stating in your answer the chronological order in which said operator 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 in which you were immediately prior to said accident.

22. State whether or not the brakes on the vehicle occupied by you or 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 it came to a stop after the occurrence of the accident made the basis of this suit.

23. State specifically what portion of the vehicles involved in the accident made the basis of this suit first came in contact with each other.

24. 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 mark which led up the point of collision. (c) 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. (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.

25. State the speed of the motor vehicle which you were driving or in which you were riding, 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 point of impact. (g) At the time of said impact. (h) When you first observed the other vehicle involved in said accident.

26. 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 so, describe each of said signals given by each respective driver specifically and in detail. (b) State how far distant from the point of collision each vehicle was located at the time each said signal was given, respectively. (c) 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 by each driver, respectively.

27. 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.

28. 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) Did the operator of the vehicle in which you were riding at the time of said occurrence make any statement concerning the accident following the same? (d) If so, state when, where and what, in substance was said. (e) 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, the driver of the vehicle in which you were riding or by the driver of the defendant's motor vehicle following the occurrence of the accident made the basis of this suit, and further indentify each such person as to what statement was made in his or her presence.

HAND, ARENDALL, BEDSOLE, GRAVES
AND JOHNSTON

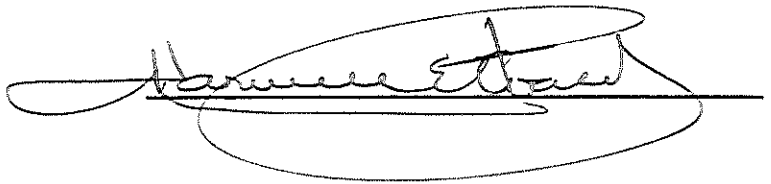
By: 

Attorneys for Defendant

STATE OF ALABAMA:

COUNTY OF BALDWIN:

Before me, the undersigned authority in and for said county in said state, this day personally appeared Harrell E Coale Jr 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 defendant 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.



Sworn to and subscribed before me on

this 26th day of May

1971.



Donald M. Davis

Notary Public


FILED

MAY 27 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Certificate of Service

I hereby certify that I have served a true and correct copy of the foregoing Interrogatories to the Plaintiff upon Taylor Wilkins, Jr., Esq., Attorney at Law, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Bay Minette, Alabama, on this, the 26th day of May, 1971.


Harwell E. Coale, Jr.

May 18, 1972

Hand, Arendall, Bedsole, Greaves & Johnston
P. O. Box 123
Mobile, Alabama 36601

Attention: Hon. Paul Brock

Re: Opal Tyree vs: Dela Harris, as Executrix of the Estate of Monroe Sloan
deceased. Case # 9773

Gentlemen:

Enclosed please find receipt for \$31.55 and the court cost bill in the
above style cause. As you can see there is a difference of \$83.85. I have
no notation that the cost to William D. Smith, Court Reporter, of \$83.45
have been paid. If these cost have been paid please remit the balance of \$.40.

Yours very truly,

CLERK, CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

EBB/asg

432-5511

TAYLOR D. WILKINS, JR.

ATTORNEY AT LAW

TELEPHONE 937-7024 P. O. BOX 546

BAY MINETTE, ALABAMA 36507

February 25, 1972

Mrs. Eunice B. Blackmon
Circuit Clerk
Baldwin County
Bay Minette, Alabama 36507

RE: Opal Tyree
vs
Dela Harris, etc.
Case # 9773

Dear Eunice:

The above case has been settled between the parties. Please have the court enter an order of dismissal and forward a copy of the cost bill to Mr. Paul Brock, Attorney at Law, P. O. Drawer C, Mobile, Alabama, 36601, attorney for the Defendant.

Thank you for your attention to this matter and with kindest regards to you, I am

Very truly yours,



Taylor Wilkins, Jr.

TWJr:sp

CC: Mr. Paul Brock

OPAL TYREE	X	IN THE CIRCUIT COURT OF
PLAINTIFF	X	BALDWIN COUNTY, ALABAMA
VS	X	AT LAW
DELA HARRIS, as Executrix of the Estate of MONROE SLOAN, deceased	X	
DEFENDANT	X	
	X	CASE NO: 9773

ANSWER TO INTERROGATORIES

Comes now the Plaintiff, Opal Tyree, in the above styled cause and files her answers to the interrogatories heretofore filed by the Defendant. Plaintiff under oath did answer as follows:

1. Opal Tyree, General Delivery, Stapleton, Alabama, age 61 years, no business address.
2. Doing domestic work at the residences of (1) K. B. Bush, Stapleton, Alabama, (2) J. C. Chastang, Stapleton, Alabama, and (3) Joe Gordon, Stapleton, Alabama.
3. (a) I had a cut across my eye and cheek of my face and was bruised over my entire body.
 (b) See above
 (c) Broken left arm
 (d) Broken left arm
 (e) N/A
4. (a) Dr. George B. Halliday, Bay Minette, Alabama.
 (b) Shock and severe pain and suffering
 (c) Continuous pain in broken left arm
 (d) I do not remember
 (e) \$263.00
 (f) The doctor has not been paid
 (g) No
 (h) No
5. (a) Yes, Bay Minette Infirmary, Bay Minette, Alabama, for approximately one week.
 (b) November 6 - November 13
 (c) \$512.55
 (d) No
 (e) N/A
6. Yes
 (a) I do not know the name of the radiologist who took the x-rays.
 (b) I did not see the x-rays
 (c) The amount of the x-ray bill was included in the total hospital bill of \$512.55.

7. (a) I had no special nurses
(b) N/A
(c) N/A
(d) N/A
8. (a) I had an ambulance bill of \$15.00 and a drug bill of \$34.77.
(b) These expenses have not been paid.
9. One Week
(a) See answer to 9
(b) Two weeks
(c) Several months
10. No
(a) N/A
(b) N/A
(c) N/A
(d) N/A
(e) N/A
(f) N/A
(g) N/A
11. It was a Plymouth automobile and I do not know the year, model or body style.
(a) Monroe Sloan
(b) Monroe Sloan, deceased
12. N/A
(a) N/A
(b) N/A
13. Two people occupied the vehicle, the driver, Monroe Sloan, deceased, and myself as a passenger in the right front of said automobile.
(a) To attend a funeral
(b) Johnson Quimby Funeral Home in Bay Minette, Alabama.
(c) To Stapleton Cemetery
(d) No
(e) N/A
14. I am unable to do this with accuracy and suggest you secure a copy of the accident report filed.
15. Yes
(a) Highway 31 South and Old Daphne Road
(b) Not to my knowledge
(c) You can see several hundred feet in both directions from the scene of the accident.
(d) The road makes into a curve at the point of the accident.
(e) A stop sign.
16. I was riding in the defendant's vehicle.
(a) N/A
(b) I don't know
(c) See above
(d) See above
(e) See above
(f) N/A
(g) The impact occurred right of the center line in the outside northern bound lane.

16. (h) I do not believe we had traveled past the right edge of the highway into the middle of the highway when the impact took place.
(i) A few feet.
17. (a) I do not know
(b) I do not know
(c) I do not know
(d) N/A
18. The defendant was not drinking to my knowledge nor was he intoxicated.
19. We had just started to pull out into Highway 31 when the impact took place.
(b) N/A
(c) N/A
(d) N/A
(e) N/A
(f) N/A
(g) N/A
(h) N/A
(i) I do not know.
20. One vehicle was traveling North and we were attempting to cross the north bound lane in the vehicle being driven by the defendant.
(a) Approximately 30 feet
(b) N/A
(c) We had just begun to enter the north bound land when the impact occurred.
21. I don't know
(a) I don't know
(b) I don't know
22. I don't know
(a) N/A
(b) N/A
23. To the best of my knowledge, the front portion of both automobiles.
24. I do not know
(a thru d) I do not know the answer to each of these.
25. Less than 5 miles per hour.
(a thru e) I do not know the answers to questions a thru e.
(f) N/A
(g) Less than 5 miles per hour.
(h) Less than 5 miles per hour.
26. I did not hear any horn sounded by any vehicle involved in the accident.
(a) N/A
(b) N/A
(c) N/A
27. I do now know of any other vehicles in the area of the accident.
(a) N/A
(b) N/A
(c) N/A

28. I did not make any statement to anyone.

- (a) N/A
- (b) N/A
- (c) N/A
- (d) N/A
- (e) N/A

X Opal Tyree
Opal Tyree

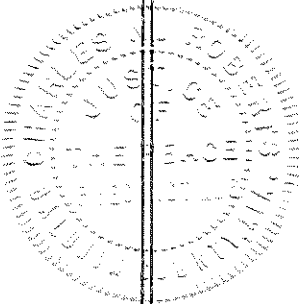
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Opal Tyree, who after being by me first duly sworn, deposes and says: That she has read the foregoing answers to the interrogatories propounded to her in the said cause, and that the answers are true to the best of her knowledge, information and belief, and that she does believe them to be true.

X Opal Tyree
Opal Tyree

Sworn to and subscribed before me on this the 24 day of October, 1971.



Charles N. Roberts, Jr.
Notary Public

My Commission Expires
January 27, 1973

FILED

OCT 26 1971

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 22 day of Oct, 1971, 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.

[Signature]

EUNICE B. BLACKMON CIRCUIT CLERK

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

June 26, 1972

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.
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS KINES, 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
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL O. KNIGHT
G. HAMP UZZELLE, III

Mrs. Eunice Blackmon
Clerk of the Court
Baldwin County Circuit Court
Bay Minette, Alabama 36532

Re: Opal Tyree vs. Dela Harris

Dear Mrs. Blackmon:

In confirmation of our telephone conversation of
today, Monday, June 26th, enclosed is our forty cents.
We had already paid Mr. Smith for the deposition he
took.

Yours very truly,



For the Firm

Enclosure


PWB.es

OPAL TYREE,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
DELA HARRIS, as Executrix)	
of the Estate of MONROE)	
SLOAN, deceased,)	
Defendant.)	CASE NO. 9773

ANSWER


Comes now the defendant in the above styled cause
and for answer to the bill of complaint filed herein says
as follows:

1. Not guilty.


Paul W. Brock
Attorney for Defendant


OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON


James R. Owen
Attorney for Defendant

Certificate of Service

I hereby certify that I have served a true and correct
copy of the foregoing answer upon Taylor Wilkins, Jr., Esq.,
Attorney at Law, by depositing a copy of same in the United
States mail, postage prepaid, addressed to said attorney
at his office in Bay Minette, Alabama, on this, the 27th
day of April, 1971.



FILED

APR 27 1971

EUNICE B. BLACKMON CIRCUIT CLERK

9773

OPAL TYREE

PLAINTIFF

VS

DELA HARRIS, as Executrix of the
Estate of MONROE SLOAN, deceased

DEFENDANT

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

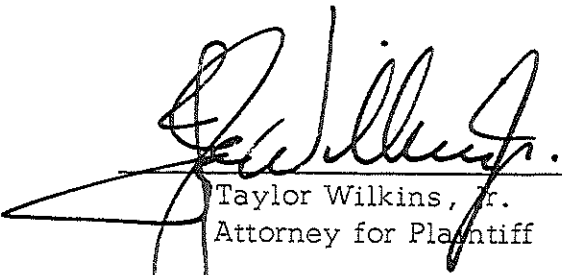
BALDWIN COUNTY, ALABAMA

AT LAW

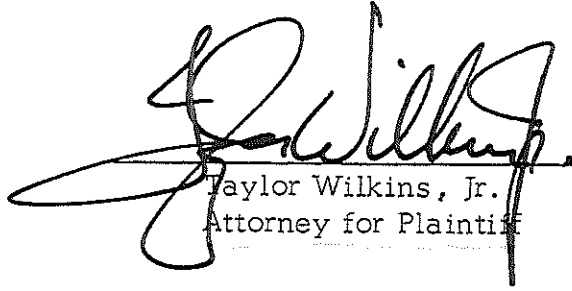
CASE NO: 9773

COMPLAINT

Plaintiff claims of the Defendant, the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore and on, to-wit, November 6, 1970, the Defendant's intestate, Monroe Sloan, wantonly injured the Plaintiff by wantonly driving an automobile in which the Plaintiff was riding as a guest of the Defendant's intestate, into and against another automobile, Plaintiff avers that at the time and place complained, the vehicle operated by the Defendant's intestate, was being operated on the Old Daphne Road, a public road in the County of Baldwin, State of Alabama, at a point where said public road intersects with U. S. Highway No. 31, a public road within the County of Baldwin, State of Alabama, and the other vehicle which the Defendant's intestate wantonly ran into and against was being operated on U. S. Highway No. 31, a public road in the County of Baldwin, State of Alabama, at a point where said road intersects with the Old Daphne Road, a public road in the County of Baldwin, State of Alabama, Plaintiff avers that as a proximate result of the wanton conduct of the Defendant's intestate, Plaintiff was made sick, sore and lame, she suffered a broken left arm, she suffered severe lacerations to her lips, head, face and nose, she suffered numerous contusions and she was caused to be hospitalized and incurred medical expenses for the treatment of her injuries, for all of which the Plaintiff brings this suit.


Taylor Wilkins, Jr.
Attorney for Plaintiff

Plaintiff respectfully demands a trial of this cause by jury.



Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED

MAR 26 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9773

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonDELA HARRIS.....

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 Dela Harris,
as Executrix of the Estate of Monroe Sloan, deceased..... Defendant.....

by Opal Tyree.....

....., Plaintiff.....

Witness my hand this 26 day of March 1971.

Ernie B. Blalock Clerk

OPAL TYREE,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY,
vs.	:	ALABAMA
DELA HARRIS, as Executrix	:	AT LAW
of the Estate of MONROE	:	
SLOAN, deceased,	:	
Defendant.	:	CASE NO. 9773

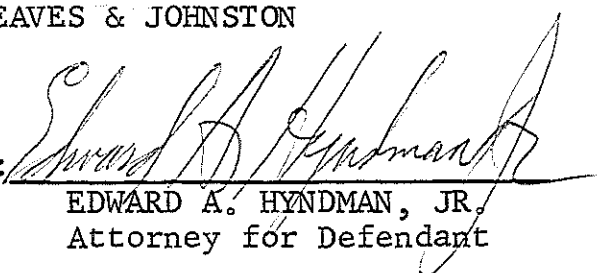
MOTION TO REQUIRE ANSWERS TO INTERROGATORIES

Comes now the defendant, Dela Harris, as Executrix of the Estate of Monroe Sloan, deceased, and shows unto the court that the said defendant has filed with the Clerk of the Court interrogatories to be propounded to the plaintiff; that said interrogatories were served on the plaintiff on, to-wit, the 26th day of May 1971; 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.

HAND, ARENDALL, BEDSOLE,
GREAVES & JOHNSTON

BY:

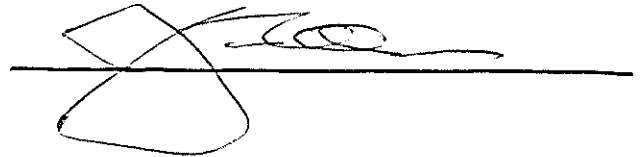

EDWARD A. HYNDMAN, JR.
Attorney for Defendant

BY:


JAMES R. OWEN
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing pleading upon Taylor Wilkins, Jr., Esquire, Attorney at Law, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at this office in Bay Minette, Alabama, on this, the 11 day of October, 1971.



FILED

OCT 11 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

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. D. 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 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
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
O. HAMP UZZELLE, III

May 27, 1971

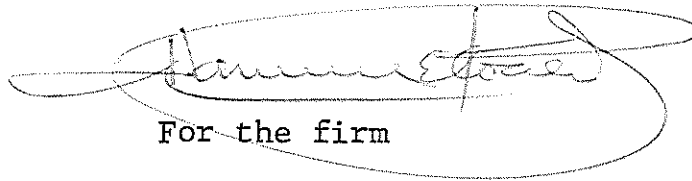
Mrs. Eunice B. Blackmon
Clerk, Circuit Court of
Baldwin County
Bay Minette, Alabama

Re: Opal Tyree v. Dela Harris, as Executrix of the
Estate of Monroe Sloan, deceased, Case No. 9773

Dear Mrs. Blackmon:

We are forwarding herewith the Certificate of
Service to be attached to the Interrogatories to the
Plaintiff on file in the Circuit Court of Baldwin County.
Thank you for bringing this to our attention.

Yours very truly,


For the firm

HECjr.jr
Enc.

OPAL TYREE, : IN THE CIRCUIT COURT OF
: BALDWIN COUNTY, ALABAMA
: AT LAW
Plaintiff :
vs. :
DELA HARRIS, as Executrix :
of the Estate of MONROE :
SLOAN, Deceased, :
Defendant : CASE NO. 9773

NOTICE

TO: Taylor Wilkins, Jr., Esquire
James Owen, Esquire

Please take notice that on the 4 day of November,
1971, in the offices of ~~Handy, Alexander, Bedsole, Greaves &~~
Dr. George B. Halliday
301 D'Olive, Bay Minette, Alabama
~~xxxxxxx, 3000 First National Bank Building, Mobile, Alabama,~~
the Defendant, Dela Harris,
will take the deposition of Dr. George B. Halliday whose
~~address is~~ xx, at 11:00 A.M.,
upon oral examination pursuant to an Act of the Legislature of
the State of Alabama, designated as Act. No. 375, Regular Session
1955, Approved September 8, 1955, before William Smith,
or another officer duly authorized to take depositions and swear
witnesses in said County in said State. The oral examination
will continue from day to day until completed and you are
invited to attend and cross-examine.

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

E. A. Hyndman, Jr

FILED
OCT 29 1971
EUNICE B. BLACKMON
CIRCUIT CLERK

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing Pleading to Taylor Wilkins Jr. Esquire, by depositing a copy of same in the United States Mail, postage prepaid, addressed to Mr. Wilkins at his office in Mobile, Alabama, on this 26 day of October, 1971

E. A. Hyndman, Jr.

NOTICE

Please take notice that on the 4 day of November,
1971, in the offices of ~~xxxxxx, xxxxxxxx, xxxxxxxx, xxxxxxxx, xxxxxxxx~~
110 Courthouse Road, Bay Minette, Alabama
~~xxxxxxxx, 3000 First National Bank Building, Mobile, Alabama,~~
the Defendant, Dela Harris,
will take the deposition of Opal Tyree whose
~~xx~~ at 10:00 A.M.,
upon oral examination pursuant to an Act of the Legislature of
the State of Alabama, designated as Act. No. 375, Regular Session
1955, Approved September 8, 1955, before William Smith,
or another officer duly authorized to take depositions and swear
witnesses in said County in said State. The oral examination
will continue from day to day until completed and you are
invited to attend and cross-examine.

E. A. Hyndman, Jr.

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

001 20 15/1

EUNICE B. BLACKMON ^{CIRCUIT}
CLERK

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing Pleading to Taylor Wilkins Jr. Esquire, by depositing a copy of same in the United States Mail, postage prepaid, addressed to Mr. Wilkins at his office in Mobile, Alabama, on this 26 day of October, 1971

E. A. Henderson Jr.
en

FILED

OCT 29 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Settled between
Partis - Sept 1
Paid with cost -