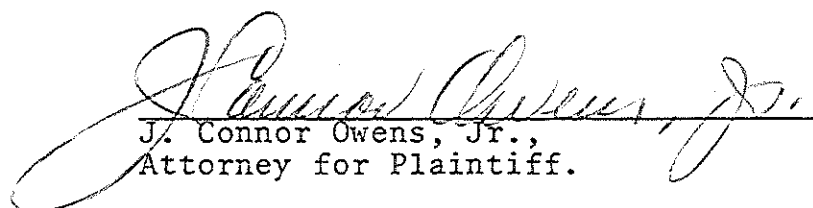


THOMAS J. KREHLING,	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	
vs.	)	BALDWIN COUNTY, ALABAMA
T. J. GIBSON, ET AL.,	)	
	)	AT LAW. NO. 11,102.
Defendant.	)	

INTERROGATORIES:

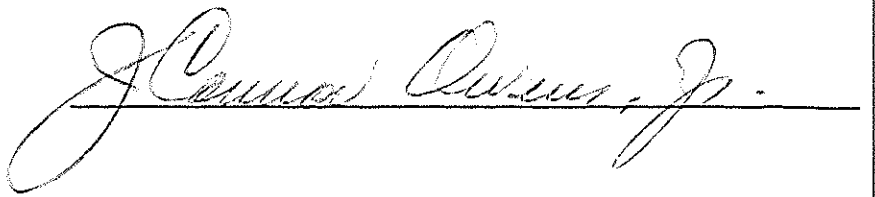
Comes the Plaintiff in the above styled cause and desiring the testimony of the Defendant, T. J. Gibson, files with the Clerk of this Court the following Interrogatories to be propounded to the said Defendant and to be answered by the said Defendant:

1. Please state your name and address.
2. Please state your occupation on November 6, 1970.
3. Please state whether or not on said date you owned an automobile and if your answer is in the affirmative, please state the make, year and model and the License Registration Number of said automobile.
4. Please state whether on said date at approximately 7:20 o'clock A. M., said automobile was being operated in Baldwin County, Alabama, and if your answer is in the affirmative, please state whether said automobile was being operated at or near a point two miles West of the center of the Town of Foley, Alabama, on U. S. Highway No. 98.
5. If your answer to Interrogatory numbered 4 is in the affirmative, please state the name of the operator of said automobile at said time and place.
6. Please state whether at approximately 7:20 o'clock A. M., on November 6, 1970, you were an occupant of said automobile when the same was being operated at or near a point two miles West of the center of the Town of Foley, Alabama, on U. S. Highway No. 98.

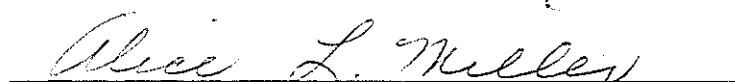
  
 J. Connor Owens, Jr.,  
 Attorney for Plaintiff.

STATE OF ALABAMA     )  
                              (  
BALDWIN COUNTY        )

Before me, the undersigned Notary Public, within and for said State and County, personally appeared J. Connor Owens, Jr., who first being duly sworn, states that he is the Attorney for the Plaintiff in the foregoing cause and that the answers to the foregoing Interrogatories when well and truly made, will be material evidence for the Plaintiff in the trial of said cause.



Sworn to and subscribed before  
me this 26th day of January, 1972.



Notary Public, Baldwin County, Alabama.

**FILED**

JAN 26 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

TO BE SERVED ON:  
COLLINS, GALLOWAY & MURPHY  
ATTORNEYS AT LAW  
958 DAUPHIN STREET  
MOBILE, ALABAMA

RECEIVED  
BALDWIN COUNTY  
JAN 23 1972

Received 28 Day of May 1972  
and on 31 Day of May 1972  
I served a Copy of the within  
of V. J. Gibson

I service on M. J. Galloway, Atty  
RAY D. BRIDGES, Sheriff  
By J. L. Bridges, S. S.

INTERROGATORIES

THOMAS J. KREHLING,

Plaintiff,

vs.

T. J. GIBSON, ET AL.,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW. NO. 11,102.

FILED

JAN 26 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

J. CONNOR OWENS, JR.

ATTORNEY AT LAW  
DAHLBERG BUILDING  
BAY MINETTE, ALABAMA

JAN 27 1972

BALDWIN COUNTY  
CLERK

STATE OF ALABAMA  
BALDWIN COUNTY

)  
(  
)

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

10,102

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon T. J. GIBSON; JOHN DOE, whose name to the Plaintiff is otherwise unknown and whose true name, when ascertained, will be substituted by amendment, being that person, firm, corporation, partnership or association, who was operating the vehicle of T. J. Gibson on the date and the occasion of the action made the basis of this suit; RICHARD ROE, whose name to the Plaintiff is otherwise unknown and whose true name, when ascertained, will be substituted by amendment, being that person, firm, corporation, partnership or association who was legally responsible for the operation of the motor vehicle described herein at the time and place of the accident made the basis of this suit; 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 the above named, by THOMAS J. KREHLING, as Plaintiff.

WITNESS my hand this 5th day of November, 1971.

*Ernie B. Blackman*  
Clerk, Circuit Court of Baldwin County,  
Alabama.

*Left address: Warden Convict Camp  
Grove Hill, Alabama*

C O M P L A I N T

THOMAS J. KREHLING,

Plaintiff,

vs.

T. J. GIBSON;

JOHN DOE, whose name to the Plaintiff is otherwise unknown and whose true name, when ascertained, will be substituted by amendment, being that person, firm, corporation, partnership or association, who was operating the vehicle of T. J. Gibson on the date and the occasion of the action made the basis of this suit; RICHARD ROE, whose name to the Plaintiff is otherwise unknown and whose true name, when ascertained, will be substituted by amendment, being that person, firm, corporation, partnership or association who was legally responsible for the operation of the motor vehicle described herein at the time and place of the accident made the basis of this suit;

Defendants.

COUNT ONE:

The Plaintiff claims of the Defendants, the sum of TEN THOUSAND DOLLARS (\$10,000.00) as damages for that on, to-wit, the 6th day of November, 1970, while the Plaintiff was operating a motor vehicle along a public highway in Baldwin County, Alabama, at or near a point two miles West of the center of the Town of Foley, on U. S. Highway Number 98, the Defendants so negligently operated a motor vehicle so as to force the motor vehicle which the Plaintiff was then and there operating off of said highway and as a proximate consequence, the Plaintiff was damaged and injured in this: his leg was severely cut; his back was injured; he was caused to be made sore and lame and suffered permanent injury to his leg; he was caused to lose time from his employment and was caused to lose remuneration therefor; he was caused to incur medical expenses in and about the treatment of his injuries and that he will incur medical expense in the future;

And Plaintiff avers that all of his said injuries and damages were caused as a proximate result of the negligence of the Defendants aforesaid in and about the operation of said motor

vehicle at said time and place.

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

Plaintiff demands a trial of this cause by a Jury.

J. Connor Owens, Jr.

Executed by serving copy of within on

J. H. Lutz  
Name

This the 11 day of Dec 1971

Ray Sheffield, Sheriff

By Joe Abraham, D.S.

**FILED**

NOV 5 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

THE SHERIFF CLAIMS 10  
MILES AT 10¢ PER MILE F R  
A TOTAL OF \$ 1.00  
Ray Sheffield SHERIFF

10,102  
SUMMONS AND COMPLAINT

THOMAS J. KREHLING,

Plaintiff,

vs.

T. J. GIBSON, ET AL.,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

I have executed this summons on  
this the \_\_\_\_\_ day of \_\_\_\_\_,  
1971, by leaving a copy with

**FILED**

NOV 5 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

J. CONNOR OWENS, JR.  
ATTORNEY AT LAW  
DAHLBERG BUILDING  
BAY MINETTE, ALABAMA

DEC 10 1971

JAYLOR WILKINS  
SHERIFF

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW  
258 DAUPHIN STREET  
MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1956)  
ROBERT H. SMITH  
WILSON M. HAWKINS, JR.

January 4, 1972

P. O. Box 4492  
TELEPHONE  
432-0568  
AREA CODE 205

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

Re: Thomas J. Krehling  
Vs: T. J. Gibson  
Case No. 11,102

And Elias Krehling  
Vs: T. J. Gibson  
Case No. 11,103

Dear Mrs. Blackmon:

Would you please file the answers in each of the  
above referred cases and advise us that they have been filed  
by noting the same on the bottom of the copy of this letter  
and return.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

By: Thomas M. Galloway  
Thomas M. Galloway

TMG/fs  
Encls:




THOMAS J. KREHLING, : IN THE CIRCUIT COURT OF  
: Plaintiff, : BALDWIN COUNTY, ALABAMA  
VS: :  
: AT LAW  
T. J. GIBSON, ET AL, :  
Defendant. : CASE NO. 10,102

Comes the defendant T. J. Gibson and for answer to  
the complaint heretofore filed says as follows:

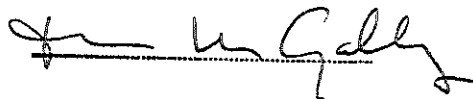
1. Not guilty.

COLLINS, GALLOWAY & MURPHY

By:   
THOMAS M. GALLOWAY  
ATTORNEYS FOR DEFENDANT T. J. GIBSON

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 5<sup>th</sup>  
day of January, 1972, served a copy of  
the foregoing pleading on counsel for all  
parties to this proceeding by mailing the  
same by United States Mail, properly ad-  
dressed, and first class postage prepaid.



**FILED**

JAN 7 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

THOMAS J. KREHLING, : IN THE CIRCUIT COURT OF  
: Plaintiff, : BALDWIN COUNTY, ALABAMA  
VS: :  
: AT LAW  
T. J. GIBSON, ET AL, :  
Defendant. : CASE NO. 11,102

Comes the defendant T. J. Gibson and for answer to  
the complaint heretofore filed says as follows:

1. Not guilty.

COLLINS, GALLOWAY & MURPHY

By: \_\_\_\_\_  
THOMAS M. GALLOWAY  
ATTORNEYS FOR DEFENDANT T. J. GIBSON

**FILED**

JAN 7 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

958 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1956)  
ROBERT H. SMITH  
WILSON M. HAWKINS, JR.

January 15, 1973

P. O. BOX 4492  
TELEPHONE  
432-0568  
AREA CODE 205

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

Re: Thomas J. Krehling  
Vs: T. J. Gibson  
Case No. 10,102

Dear Mrs. Blackmon:

I enclose herewith answer to the amended complaint as filed in this matter. Would you please file the same and let me know the same has been filed by noting on the bottom of this letter and returning.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

By:

  
Thomas M. Galloway

TMG/fs

Encl:

THOMAS J. KREHLING, : IN THE CIRCUIT COURT OF  
Plaintiff, :  
VS: : MOBILE COUNTY, ALABAMA  
T. J. GIBSON, : AT LAW  
Defendant. : CASE NO. 10,102

Comes now the defendant in the above styled matter  
and for answer to the complaint, as amended, says as follows:

1. Not guilty.

COLLINS, GALLOWAY & MURPHY

By: *Th. M. Galloway*  
THOMAS M. GALLOWAY  
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE  
I do hereby certify that I have on this.....  
day of..... 1973, served a copy of  
the foregoing pleading on counsel for all  
parties to this proceeding by mailing the  
same by United States Mail, properly ad-  
dressed, and first class postage prepaid.

*Th. M. Galloway*

FILED

JAN 16 1973

EUNICE B. BLACKMON CIRCUIT  
CLERK

THOMAS J. KREHLING,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	
vs.	)	BALDWIN COUNTY, ALABAMA
T. J. GIBSON, ET AL.,	)	CASE NO. 10,102.
Defendants.	)	

AMENDED COMPLAINT:

Now comes the Plaintiff in the above styled matter and amends the complaint heretofore filed, so that as amended, the same shall read as follows:

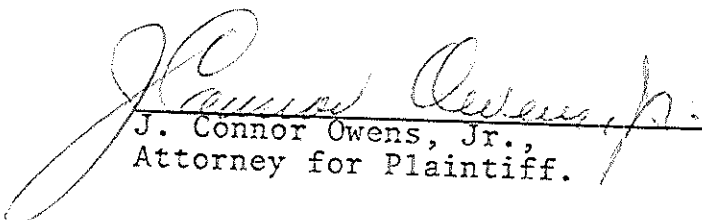
THOMAS J. KREHLING,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	
vs.	)	BALDWIN COUNTY, ALABAMA
T. J. GIBSON,	)	AT LAW. NO. 10,102.
Defendant.	)	

COUNT ONE:

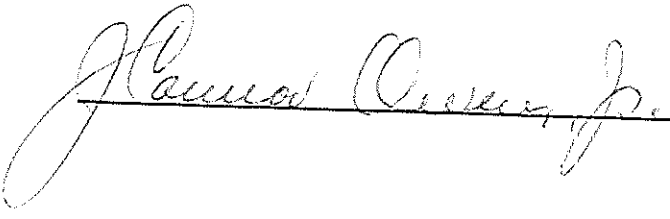
The Plaintiff claims of the Defendant, the sum of TEN THOUSAND DOLLARS (\$10,000.00) as damages for that on, to-wit, the 6th day of November, 1970, while the Plaintiff was operating a motor vehicle along a public highway in Baldwin County, Alabama, at or near a point two miles West of the center of the Town of Foley, on U. S. Highway Number 98, the Defendant so negligently operated a motor vehicle so as to force the motor vehicle which the Plaintiff was then and there operating off of said highway and as a proximate consequence, the Plaintiff was damaged and injured in this: his leg was severely cut; his back was injured; he was caused to be made sore and lame and suffered permanent injury to his leg; he was caused to lose time from his employment and was caused to lose remuneration therefor; he was caused to incur medical expenses in and about the treatment of his injuries and that he will incur medical expense in the future;

And Plaintiff avers that all of his said injuries and damages were caused as a proximate result of the negligence of the

Defendant aforesaid in and about the operation of said motor vehicle at said time and place.

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

Plaintiff demands a trial of this cause by a Jury.

  
I, the undersigned Attorney of Record for the Plaintiff in the foregoing cause do hereby certify that I have caused a copy of the foregoing amended complaint to be served on Thomas M. Galloway, the attorney of record for the Defendant in said cause, by placing the same in the United States Mail, properly addressed, with postage prepaid, this 8th day of January, 1973.

  
**FILED**

JAN 9 1973

EUNICE B. BLACKMON CIRCUIT  
CLERK


THOMAS J. KREHLING,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
T. J. GIBSON, ET AL.,	)	
Defendant.	)	AT LAW. NO. 10,102.

NOTICE OF DEPOSITION:

TO: MR. THOMAS M. GALLOWAY  
ATTORNEY AT LAW  
P. O. BOX 4492  
MOBILE, ALABAMA 36601

You are hereby notified that the Plaintiff, Thomas J. Krehling, will take the deposition of Mr. T. J. Gibson, the Defendant in this cause, at the Law Library located in the Baldwin County Courthouse in Bay Minette, Alabama, on Friday, March 17, 1972, at the hour of 10:00 o'clock A. M., before Mrs. Louise Dusenbury, or before some other officer authorized by law to take depositions. The deposition is to be taken in accordance with and pursuant to Act No. 375 of the Alabama Legislature of 1955, as amended, and will continue from day to day until the completion of the same, and you are invited to attend and examine the deponent.

DATED this 10th day of March, 1972.

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

I, the undersigned, Attorney of Record for the Plaintiff in the foregoing cause, do hereby certify that I have caused a copy of the foregoing notice to be served on Thomas M. Galloway, the Attorney of Record for the Defendant in said cause, by depositing the same in the United States Mail, properly addressed, with postage prepaid, this 10th day of March, 1972.

  
**FILED**

MAR 13 1972

EUNICE B. BLACKMON CIRCUIT CLERK

THOMAS J. KREHLING, : IN THE CIRCUIT COURT OF  
 Plaintiff, : BALDWIN COUNTY, ALABAMA  
 VS: :  
 : AT LAW  
 T. J. GIBSON, ET AL, :  
 Defendant. : CASE NO. 14,102

Comes now T. J. Gibson and for answers to interrogatories as heretofore filed in this matter says as follows:

1. T. J. Gibson, Post Office Box 367, Grove Hill, Alabama 36451.

2. Highway Superintendent for Highway Department, State of Alabama.

3. I owned two automobiles at the time and a pickup truck. One automobile was a 1967 Galaxie 500 Ford 4 Door with a 1971 license registration number 16-432. The other automobile was a 1970 Ford Maverick Tudor, 1971 registration of 16-433.

4. Neither of my automobiles were being operated in Baldwin County at that time.

5. Not applicable.

6. Not applicable.

T. J. Gibson  
 T. J. Gibson

STATE OF ALABAMA:

COUNTY OF Clarke:

Before me the undersigned authority in and for said State and County, personally appeared T. J. Gibson, who is known to me and who by me being first duly sworn upon oath deposes and says that the answers to interrogatories as hereinabove set out are true and correct.

[Signature]  
 Notary Public, Expires 7-8-74

COLLINS, GALLOWAY & MURPHY

By: [Signature]  
 THOMAS M. GALLOWAY  
 ATTORNEYS FOR DEFENDANTS

**FILED**

MAR 3 1972

EUNICE B. BLACKMON CIRCUIT CLERK



Bay Minette, Ala.,

Jan. 27 1972

To the Sheriff of

Mobile

County,

Mobile

Alabama

I enclose herewith

an Interrog. for service on  
Collins, Galloway + Murphy, Attorneys  
at Law, 958 Dauphin St, Mobile

Thanks

Please serve and return as early as possible.

Jayla Whitani

Sheriff, Baldwin County, Alabama

(If not found in your county, please advise promptly giving information as to present location if possible)