

LEONA CARAWAY, As	X		
Administratrix of the	X		
Estate of ELSIE MAE	X	IN THE CIRCUIT COURT OF	
HART, Deceased,	X		
	X		
Plaintiff,	X		
	X	BALDWIN COUNTY, ALABAMA	
vs.	X		
	X		
POOLE TRUCK LINE, INC.,	X	AT LAW	NO. 10,424
a corporation, and LEE	X		
FRED ODOM,	X		
	X		
Defendants.	X		

INTERROGATORIES PROPOUNDED TO THE DEFENDANT
POOLE TRUCK LINE, INC.

Comes now the Plaintiff in the above styled cause and propounds the following Interrogatories to the Defendant, Poole Truck Line, Inc.:

1. Please state your correct corporate name.
2. Were you, on the 21st day of June, 1971, the owner of a 1966 Mack Truck, Identification Number R607T-1507, bearing Alabama license tag number 21X7-263 for the year 1971 which was involved in an accident in Baldwin County, Alabama, on said date on U. S. Highway Number 90 approximately 2 miles South of Loxley in Baldwin County, Alabama, at the intersection of said Highway with DuBose Road?
3. If the answer to the above Interrogatory is in the affirmative, please state whether you were the owner of the trailer attached to said truck.
4. If your answer to the foregoing Interrogatory is in the affirmative, please state whether there was any cargo on said trailer, the type of cargo, if any, and the owner of such cargo.
5. On June 21, 1971, was Lee Fred Odom your agent, servant or employee?
6. If your answer to the foregoing Interrogatory is in the affirmative, please state whether Lee Fred Odom was, on that

day, involved in an accident on U. S. Highway Number 90 approximately 2 miles South of Loxley in Baldwin County, Alabama, at the intersection of said Highway with DuBose Road, while driving the tractor referred to in Interrogatory Number 2.

7. If your answer to the foregoing Interrogatory is in the affirmative, was Lee Fred Odom at said time and place acting within the line and scope of his employment as your agent, servant or employee?

CHASON, STONE & CHASON

By: 
Attorneys for Plaintiff

STATE OF ALABAMA

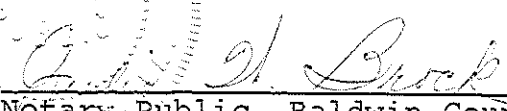
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Chason, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That he is one of the attorneys of record for the Plaintiff in the above styled cause and that the answers to the Interrogatories hereinabove propounded to the Defendant, Poole Truck Line, Inc., will be material evidence in the cause.


John Chason

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

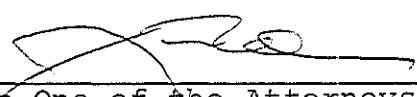

Notary Public, Baldwin County, Alabama

FILED

OCT 26 1972

EUNICE B. BLACKMON CIRCUIT CLERK

I hereby accept service of a copy of the foregoing Interrogatories and waive further service of the same this 26th day of October, 1972.


As One of the Attorneys for Defendants

LEONA CARAWAY, as Administratrix
of the Estate of ELSIE MAE HART,
Deceased,

Plaintiff,

vs.

POOLE TRUCK LINE, INC., a
corporation, and LEE FRED ODOM,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF

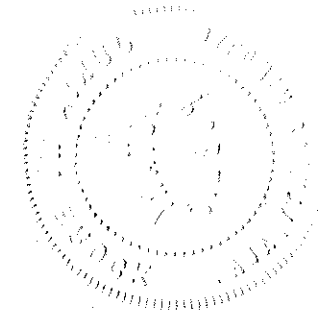
BALDWIN COUNTY, ALABAMA

AT LAW NO. 10,424

* * * * *

INTERROGATORIES PROPOUNDED TO
THE DEFENDANT, POOLE TRUCK
LINE, INC.

* * * * *



FILED
1956

CLERK OF THE COURT

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Poole Truck Line, Inc., a corporation, and Lee Fred Odom, 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 Leona Caraway, as Administratrix of the Estate of Elsie Mae Hart, Deceased.

Witness my hand this 21st day of May, 1972.

Lucille B. Blackburn
Clerk

LEONA CARAWAY, as Ad-
ministratrix of the
Estate of ELSIE MAE
HART, Deceased,

Plaintiff,

vs.

POOLE TRUCK LINE, INC.,
a corporation, and LEE
FRED ODOM,

Defendants.

X
X
X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

12424

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Four Hundred Thousand Dollars (\$400,000.00) as damages, for that heretofore and on, to-wit: June 21, 1971, the Defendant Lee Fred Odom, an agent, servant or employee of the Defendant, Poole Truck Line, Inc., a corporation, while acting within the line and scope of his authority as such agent, servant or employee, so negligently

operated a motor vehicle on U. S. Highway 90 approximately two miles South of Loxley in Baldwin County, Alabama, at its intersection with DuBose Road, said Highway and Road being public roads in Baldwin County, Alabama, so as to cause the same to collide with an automobile in which the Plaintiff's intestate was then and there riding, proximately inflicting upon Plaintiff's intestate injuries which proximately caused her death.

CHASON, STONE & CHASON

By: *[Signature]*
Attorneys for Plaintiff

The Plaintiff demands a trial
by a jury.

CHASON, STONE & CHASON

By: *[Signature]*
Attorneys for Plaintiff

Addresses for Defendants:

Poole Truck Line, Inc.
Evergreen, Alabama

Lee Fred Odom
Loxley, Alabama

FILED

MAY 26 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Received in office this the _____ day of _____, 19____

I have executed the within, by leaving a copy thereof with Mr Robert Tate, Exec Vice - Pres. of Poole Truck Lines defendant named herein, on this the 1st day of June, 1972

JAMES M. BROOK, Sheriff
By W. H. Weann Deputy

10.424

LEONA CARAWAY, as Administratrix
of the Estate of ELSIE MAE HART,
Deceased,

Plaintiff,

VS.

POOLE TRUCK LINE, INC., a corp-
oration, and LEE FRED ODOM,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

MAY 26 1972

MAY 26 1972

MAILED
SHIRLEY

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. BOX 120
BAY MINETTE, ALABAMA

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY W. L. Odom DEPUTY SHERIFF

Received 26 day of May 1972
and on 3 day of June 1972
I served a copy of the within file
on Lee Fred Odom

By service on _____

TAYLOR WILKINS, Sheriff
W. L. Odom
Lee Fred Odom
Copy.

LEONA CARAWAY, as Administratrix
of the Estate of ELSIE MAE HART,
Deceased,

Plaintiff,

vs.

POOLE TRUCK LINE, INC., a
corporation, and LEE FRED ODOM,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW


CASE NO. 10,424

ANSWER

Come now the defendants in the above styled cause and for
answer to the plaintiff's complaint therein and to each count thereof,
separately and severally, make and file the following separate and
several pleas:


1. Not guilty.
2. Defendants deny the material allegations thereof.

INGE, TWITTY, DUFFY & PRINCE

By 
Sydney R. Prince, III

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been
served upon counsel for all parties to this proceeding,
by mailing the same to each by First Class United States
Mail, properly addressed and postage prepaid on this
29th day of June, 1972.


Attorney for Defendants

FILED

JUN 30 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

ARMBRECHT, JACKSON & DEMOUY
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P. O. BOX 290

MOBILE, ALABAMA

36601

TELEPHONE
AREA CODE 205
432-6751

CABLE ADDRESS
SEALAW

WM. H. ARMBRECHT
THEODORE K. JACKSON
MARSHALL J. DEMOUY
WM. H. ARMBRECHT, III
RAE M. CROWE
BROOX G. HOLMES
W. BOYD REEVES
FRANK B. MCRIGHT
CLIFFORD FOSTER, III
T. K. JACKSON, III
E. B. PEEBLES, III
F. M. KEELING
GEOFFREY V. PARKER
THOMAS M. AMMONS, III
WILLIAM B. HARVEY
KIRK C. SHAW
NORMAN E. WALDROP, JR.

June 29, 1972

Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507

Re: Charles M. Day
v. Mothershead Oil Co.,
et al.; Case No. 10,369

Dear Mrs. Blackmon:

We are enclosing two copies of Interrogatories which we wish to file in this cause. Will you kindly see that they are served upon Plaintiff's counsel through the Sheriff.

Very truly yours,



Norman E. Waldrop, Jr.

NEW/ams

Enclosures

LEONA CARAWAY, As Administratrix
of the Estate of ELSIE MAE HART,
Deceased,

Plaintiff,

vs.

POOLE TRUCK LINE, INC., a
corporation, and LEE FRED ODOM,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,424

ANSWERS TO INTERROGATORIES

Comes now the defendant POOLE TRUCK LINE, INC., in the above captioned cause and for answer to the interrogatories propounded to it states as follows:

1. Poole Truck Line, Inc.
2. Yes.
3. Yes.
4. There was a cargo on the trailer. The cargo consisted of bags of cement which were owned by Ideal Cement Company of Mobile.
5. Yes.
6. Yes.
7. Yes.

POOLE TRUCK LINE, INC.

By A. J. Price
As its Director of Safety

STATE OF ALABAMA

COUNTY OF CONECUH

Personally appeared before me, the undersigned authority in and for said county in said state, A. J. Price, whose name as Safety Director of POOLE TRUCK LINE, INC., who is known to me and who, after having been duly sworn, on oath, stated that he has read the foregoing Answers to Interrogatories previously propounded to Poole Truck Line, Inc. by the plaintiff in this law suit, and that the answers are true to the best of his knowledge and belief.

Given this 6th day of November, 1972.

Lemuel C. Bowden
Notary Public

FILED

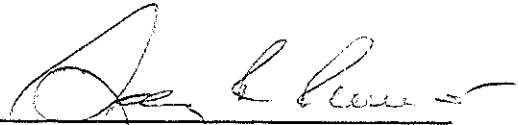
NOV 9

1972

EUNICE B. BLACKMON
CIRCUIT CLERK

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 7th day of November, 1972.



Attorney for Poole Truck Line, Inc.

FILED

NOV 9 1972

EUNICE B. BLACKMON CIRCUIT
CLERK