

your automobile?

Answer:

The actual cost of repairing my automobile was \$177.00.

Signed

Harold E. Kay

State Of New York)

County of New York) ss

I, CLARENCE S. BIRKMEYER, do certify that HAROLD E. KAY, the witness, personally appeared before me on the 13th day of June, 1955 at approximately 4:00 o'clock in the afternoon at my office 350 Madison Avenue, Room #1802, County and State of New York, and that he was duly sworn to testify to the truth, the whole truth and nothing but the truth, and did swear to the truth of the answers contained in the foregoing deposition, and did in my presence subscribe the same. I further certify that the deposition was duly taken and is a true record of the testimony of the witness of all questions and answers required to be answered; that the signature of the witness to the deposition is genuine.

Clarence S. Birkmeyer
Commissioner

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.
AT LAW. NO. 2335

HAROLD E. KAY,

Plaintiff

vs.

E. C. JOHNSON,

Defendant.

INTERROGATORIES

of HAROLD E. KAY

Clarence S. Birkmeyer
Commissioner

FILED

JUN 15 1955

ALICE J. DUCK, Clerk

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Clarence S. Birkmeyer,

350 Madison Avenue,

New York 17, New York

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Harold E. Kay

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

Harold E. Kay

and E. C. Johnson

~~Complainant Plaintiff~~

~~Respondent~~

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

Witness 31st day of May, 195 5

Allice J. Duck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

HAROLD E. KAY,

Plaintiff,

VS.

E. C. JOHNSON,

Respondent.

0
0
0
0
0
0
0
0

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

INTERROGATORIES

Now comes the plaintiff in the above styled cause and propounds interrogatories to HAROLD E. KAY, a witness whose testimony, when taken, will be material evidence for the plaintiff on the trial of the above cause.

Interrogatories to HAROLD E. KAY, witness:

First Interrogatory:

What is your name, age, and place of residence?

Second Interrogatory:

Where were you on the 3rd day of October, 1953?

Third Interrogatory:

Were you involved in an automobile accident?

Fourth Interrogatory:

If your answer to the preceding interrogatory was "Yes", please explain briefly what happened?

Fifth Interrogatory:

What kind of car were you driving? Give make, model and body type?

Sixth Interrogatory:

What damages, if any, did your car suffer as a result of this accident?

Seventh Interrogatory:

On, or before, the 3rd day of October, 1953, had you bought and/or sold automobiles similar to yours and were you familiar with, or did you know, the reasonable market value of automobiles similar to yours?

Eighth Interrogatory?

What was the reasonable market value of your automobile immediately prior to the accident?

Ninth Interrogatory:

What was the reasonable market value of your automobile immediately after the accident?

Tenth Interrogatory:

Did you talk with the driver of the other vehicle which collided with your automobile, and, if so, did he tell you to whom the vehicle belonged and for whom he was driving?

Eleventh Interrogatory:

If your answer to the preceding interrogatory was "Yes", to whom did the driver of the other vehicle say it belonged, and for whom did he tell you he was driving at the time of the accident?

Twelfth Interrogatory:

If your answer to the preceding interrogatory is "E. C. JOHNSON", did you immediately go to see Mr. Johnson and have a conversation with him with regard to the accident?

Thirteenth Interrogatory:

What was the substance of your conversation with Mr. E. C. Johnson?

Fourteenth Interrogatory:

Did Mr. E. C. Johnson, at that time, agree to pay for the repairs to your automobile? If so, has he paid for them?

Fifteenth Interrogatory:

What was the actual cost of repairing your automobile?

Jeffair J. Mashburn, Jr.
ATTORNEY FOR PLAINTIFF.

STATE OF ALABAMA, 0
 0
COUNTY OF BALDWIN. 0

Before me, James R. Owen, a Notary Public in and for said County and State, personally appeared HELFAIR J. MASHBURN, JR., who is known to me and who, being by me first duly sworn, deposes and says: That he is agent and attorney for the plaintiff, HAROLD E. KAY; that the witness whose testimony is to be taken is a non-resident of the State of Alabama, residing in Mountain View, New Jersey; that the witness, HAROLD E. KAY, is a material witness for the plaintiff and his evidence to be secured by this deposition will be material evidence for the plaintiff on the trial of this cause.

Jeffair J. Mashburn, Jr.
ATTORNEY FOR PLAINTIFF

Sworn to and subscribed before me this 31st day of May, 1955.

James R. Owen
NOTARY PUBLIC, BALDWIN COUNTY,
ALABAMA.

The name of CLARENCE S. BIRKMEYER, 350 Madison Avenue, New York 17, New York, 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.

Jeffair J. Mashburn, Jr.
ATTORNEY FOR PLAINTIFF.

STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA:
COUNTY OF BALDWIN. 0

You are hereby commanded to summon JOHN DOE, whose name is to the plaintiff otherwise unknown, but will be inserted by way of amendment when ascertained, who, on October 3, 1953, was driving a log truck belonging to E. C. Johnson of Bay Minette, Alabama, and E. C. JOHNSON 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 the same, then and there to answer the complaint of HAROLD E. KAY.

Witness my hand this 30th day of July, 1954.

Deane J. Smith
CLERK.

C O M P L A I N T.

HAROLD E. KAY,	0	IN THE CIRCUIT COURT OF
	0	
Plaintiff,	0	BALDWIN COUNTY, ALABAMA.
	0	
Vs.	0	AT LAW.
	0	
JOHN DOE and E. C. JOHNSON,	0	NO. _____
	0	
Defendants.	0	

C O U N T O N E.

The plaintiff claims of the defendants the sum of THREE HUNDRED (\$300.00) DOLLARS as damages for that, heretofore, on, to-wit: the 3rd day of October, 1953, at about 11:30 O'clock, A. M., on U. S. Highway No. 31, a public highway in Baldwin County, Alabama, at a point about 10 miles East of Bay Minette, Alabama, the defendant, JOHN DOE, whose name is to the plaintiff otherwise unknown, but will be inserted by way of amendment when ascertained, and who was then and there an agent, servant or employee of the defendant, E. C. JOHNSON, acting within the line and scope of his employment as such, so negligently operated a log truck which he was then and there driving as to cause the said log truck to run into, upon or against the plaintiff's automobile, as a proximate consequence whereof plaintiff's automobile was bent, broken and damaged, the right front fender, door, paneling and cowlings was bent broken and damaged, the right rear

door was bent and broken, the right rear fender was bent and broken, both front and rear bumpers, on the right side, were bent and broken; plaintiff was deprived of the use of his automobile, which was used in his business, for a long period of time, all to his great damage as aforesaid; hence this suit.

William A. Madaleno, Jr.
Attorney for Plaintiff.

Plaintiff respectfully requests that this cause be tried by a jury.

William A. Madaleno, Jr.
Attorney for Plaintiff.

Plaintiff is a non-resident, and, therefore, is depositing herewith a cashier's check in the amount of \$25.00, with the Clerk of this Court, as security for the costs' of this action.

FILED

7-30 1954

ALICE L. DUCK, Clerk

William A. Madaleno, Jr.
Attorney for Plaintiff.

BOOK 003 PAGE 410

Received 31 day of July 19 54
and on 31 day of July 19 54
I served a copy of the within E.C.
on _____

By service on E.C. Johnson

TAYLOR WILKINS, Sheriff
By T. H. H. H. D.S.

RECORDED
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.
NO. 2335

HAROLD E. KAY, AND A. C.
Plaintiff,
VS.
JOHN DOE AND E. C. JOHNSON,
Defendants.

SUMMONS AND COMPLAINT.

FILED
JUL 30 1954
ALICE J. DUCK, Clerk

TELFAIR J. MASHBURN, JR.
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

HAROLD E. KAY,
Plaintiff,

VS.

E. C. JOHNSON,
Defendant.

RAY E. LOPER LUMBER COMPANY,
A CORPORATION,
Garnishee.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 2335

Personally appeared before me, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County, Alabama, Telfair J. Mashburn, Jr., who being duly sworn, deposes and saith that HAROLD E. KAY on the 21st day of June, 1955, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against E. C. JOHNSON for the sum of One Hundred Seventy-seven and 0/100ths (\$177.00) Dollars and the further sum of Twenty-five (\$25.00) Dollars costs of court, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that the RAY E. LOPER LUMBER COMPANY, A CORPORATION, has, or is believed to have, in its possession or under its control money or effects belonging to the defendant, or is believed to be indebted to the said defendant.

Telfair J. Mashburn, Jr.

Sworn to and subscribed before me this 23rd day of December, 1955.

Alice J. Duck
CLERK OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

W R I T

STATE OF ALBAMA, 0
COUNTY OF BALDWIN. 0

TO ANY SHERIFF OF THE STATE OF ALABAMA--GREETING:

Whereas Telfair J. Mashburn, Jr., has made affidavit as required by law that HAROLD E. KAY, on the 21st day of June, 1955, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against E. C. JOHNSON for the sum of \$177.00, and the further sum of \$25.00 costs of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that RAY E. LOPER LUMBER COMPANY, A CORPORATION has, or is believed to have in

its possession or under its control, money or effects belonging to the said defendant, or it is believed to be indebted to the said defendant.

These are therefore to command you that you summon the said RAY E. LOPER LUMBER COMPANY, A CORPORATION, to be and appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, within thirty days after service of this writ of garnishment, then and there to answer on oath, whether at the time of the service of this writ, or at the time of making its answer, it has in its possession, or under its control, any money or effects belonging to the said defendant; and whether it is indebted to the said defendant.

Witness, ALICE J. DUCK, Clerk of said Court at Office, this 23rd day of December, 1955.


CLERK OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

STATE OF ALABAMA, 0
 0
COUNTY OF BALDWIN. 0

TO ANY SHERIFF OF THE STATE OF ALABAMA, -GREETING:

You are hereby commanded to notify E. C. JOHNSON that on the 23rd day of December, 1955, a writ of garnishment in the above stated case was issued to RAY E. LOPER LUMBER COMPANY, A CORPORATION, as Garnishee.

And you will return this writ according to law.

Witness my hand this 23rd day of December, 1955.


CLERK OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

HAROLD E. KAY,
Plaintiff,

VS.

E. C. JOHNSON,
Defendant.

RAY E. LOPER LUMBER COMPANY,
A CORPORATION,

Garnishee.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2335

Now comes the Ray Loper Lumber Company, a Corporation,
the Garnishee named in this cause, and for answer to the Writ of
Garnishment served on it in this cause, says:

1. It was not indebted to the Defendant at the time of
the service of the Writ of Garnishment in this cause, it is not
now indebted to the Defendant and will not be indebted to the
Defendant in the future by any contract now in existence.

Having fully answered the said Writ of Garnishment,
Garnishee prays that it be discharged with its reasonable costs in
this behalf expended.

RAY E. LOPER LUMBER COMPANY,
A Corporation,

By [Signature]
As its President

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for
said County in said State, personally appeared Ray E. Loper
who, after being by me first duly and legally sworn, deposes and
says: That he is President of the Ray E. Loper
Lumber Company, a Corporation and that the facts stated in the
foregoing answer are true.

Sworn to and subscribed before me
on this the 20th day of January, 1956.

[Signature]
Notary Public, Baldwin County, Alabama.

DEPOSITION OF WITNESS PRODUCED, SWORN
AND EXAMINED THIS 13th DAY OF JUNE, IN
THE YEAR NINETEEN HUNDRED FIFTY-FIVE
IN THE BOROUGH OF MANHATTAN, CITY AND
STATE OF NEW YORK, UNDER AND BY VIRTUE
OF A COMMISSION ISSUED OUT OF THE
CIRCUIT COURT, BALDWIN COUNTY, STATE
OF ALABAMA, IN A CERTAIN CAUSE THEREIN
PENDING AND AT ISSUE, ENTITLED:

HAROLD E. KAY, :
Plaintiff : IN THE CIRCUIT COURT OF
vs. : BALDWIN COUNTY, ALABAMA.
E. C. JOHNSON, : AT LAW. NO. 2335
Respondent. :
:

HAROLD E. KAY, at present residing at Stanley Street (PO
Box #351) Mountain View, New Jersey, age forty-six, being duly
sworn pursuant to the directions hereto annexed and examined
in behalf of plaintiff, deposes and says as follows:

First Interrogatory: What is your name, age, and place
of residence?

Answer: Harold E. Kay, Age, 46, residing at
Stanley Street (P O Box #351), Mount-
ain View, New Jersey.

Second Interrogatory: Where were you on the 3rd day of
October, 1953?

Answer: Riding as a passenger in an automobile
belonging to me, operated by my mother
driving in a westward direction through
the State of Alabama, on Highway U.S.
#31.

Third Interrogatory: Were you involved in an automobile
accident?

Answer: Yes.

Fourth Interrogatory: If your answer to the preceding inter-
rogatory was "Yes", please explain
briefly what happened?

Answer: When my vehicle, in which I was riding
as a passenger, and being operated by
my mother was approximately 10 miles
east of Bay Minette, Alabama on U. S.
Highway #31, my mother attempted to
pass a tractor trailer truck loaded
with logs, which was also traveling in
a westward direction. She signalled

Answer:

Yes, I talked with the operator of the trailer truck and he told me to whom the vehicle belonged, and for whom he was driving.

Eleventh Interrogatory:

If your answer to the preceding interrogatory was "Yes", to whom did the driver of the other vehicle say it belonged, and for whom did he tell you he was driving at the time of the accident?

Answer:

To Mr. Johnson of Bay Minette, Alabama and that he was driving the vehicle for Mr. Johnson.

Twelfth Interrogatory:

If your answer to the preceding interrogatory is "E. C. JOHNSON", did you immediately go to see Mr. Johnson and have a conversation with him with regard to the accident?

Answer:

Yes, I did see Mr. E. C. Johnson shortly after the accident occurred at his residence in Bay Minette and had a conversation with him with regards to the accident.

Thirteenth Interrogatory:

What was the substance of your conversation with Mr. E. C. Johnson?

Answer:

Mr. E. C. Johnson admitted to me in the presence of my mother, father and aunt that his tractor trailer truck had been in a collision with my automobile, and that his driver was fully to blame. He expressed extreme regret for the damages and inconvenience it caused and said that he was fully insured and showed me an insurance policy of the Fidelity & Casualty Company of New York, which I noted was made out to him as the assured and had not expired. I was advised that he would report the accident in full to his insurance agent the following Monday, as the office of his agent was closed at that time, Sat.p.m.

Fourteenth Interrogatory:

Did Mr. E. C. Johnson, at that time, agree to pay for the repairs to your automobile? If so, has he paid for them?

Answer:

Mr. E. C. Johnson agreed that he would have his insurance company pay me for the damages sustained to my vehicle. Neither Mr. Johnson nor his insurance Company have paid me for this damage.

Fifteenth Interrogatory:

What was the actual cost of repairing

the operator of this trailer truck that she intended to pass him , by sounding her horn and as she was in the process of passing this trailer truck, the driver thereof, for no reason, swerved his vehicle to the left, side-swiping my car and causing damage thereto. After the accident the operator of the trailer truck left the scene of the accident, but I caught up with him. After a few words with him, I requested him to wait for the State Highway Patrol whom I was informed had been called. However, in a few minutes the operator of this tractor trailer truck again ran away.

Fifth Interrogatory:

What kind of car were you driving? Give make, model and body type.

Answer:

My vehicle operated by my mother was a 1952 Dodge Meadowbrook Sedan.

Sixth Interrogatory:

What damages, if any, did your car suffer as a result of this accident?

Answer:

As a result of this accident, my car suffered damages to the right front fender, right front door and door post, right rear door, right rear fender, rear quarter panel, complete destruction of the chromium molding on both right fenders and right doors. A Motor Car Company in Mountain View, New Jersey upon my return, gave me an estimate of \$177. to repair my vehicle.

Seventh Interrogatory:

On, or before, the 3rd day of October, 1953, had you bought and/or sold automobiles similar to yours and were you familiar with, or did you know, reasonable market value of automobiles similar to yours?

Answer:

Yes

Eighth Interrogatory:

What was the reasonable market value of your automobile immediately prior to the accident?

Answer:

Approximately \$2100.00

Ninth Interrogatory:

What was the reasonable market value of your automobile immediately after the accident?

Answer:

Approximately \$1900.00.

Tenth Interrogatory:

Did you talk with the driver of the other vehicle which collided with your automobile, and, if so, did he tell you to whom the vehicle belonged and for whom he was driving?

STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA;
COUNTY OF BALDWIN. 0

You are hereby commanded to summon JOHN DOE, whose name is to the plaintiff otherwise unknown, but will be inserted by way of amendment when ascertained, who, on October 3, 1953, was driving a log truck belonging to E. C. Johnson of Bay Minette, Alabama, and E. C. JOHNSON 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 the same, then and there to answer the complaint of HAROLD E. KAY.

Witness my hand this 30th day of July, 1954.

Reece J. Much
CLERK.

C O M P L A I N T.

HAROLD E. KAY,	0	IN THE CIRCUIT COURT OF
	0	
Plaintiff,	0	BALDWIN COUNTY, ALABAMA.
	0	
Vs.	0	AT LAW.
	0	
JOHN DOE and E. C. JOHNSON,	0	NO. _____
	0	
Defendants.	0	

C O U N T O N E.

The plaintiff claims of the defendants the sum of THREE HUNDRED (\$300.00) DOLLARS as damages for that, heretofore, on, to-wit: the 3rd day of October, 1953, at about 11:30 O'clock, A. M., on U. S. Highway No. 31, a public highway in Baldwin County, Alabama, at a point about 10 miles East of Bay Minette, Alabama, the defendant, JOHN DOE, whose name is to the plaintiff otherwise unknown, but will be inserted by way of amendment when ascertained, and who was then and there an agent, servant or employee of the defendant, E. C. JOHNSON, acting within the line and scope of his employment as such, so negligently operated a log truck which he was then and there driving as to cause the said log truck to run into, upon or against the plaintiff's automobile, as a proximate consequence whereof plaintiff's automobile was bent, broken and damaged, the right front fender, door, paneling and cowlings was bent broken and damaged, the right rear

Eleventh Interrogatory:

If your answer to the preceding interrogatory was "Yes", to whom did the driver of the other vehicle say it belonged, and for whom did he tell you he was driving at the time of the accident?

Twelfth Interrogatory:

If your answer to the preceding interrogatory is "E. C. JOHNSON", did you immediately go to see Mr. Johnson and have a conversation with him with regard to the accident?

Thirteenth Interrogatory:

What was the substance of your conversation with Mr. E. C. Johnson?

Fourteenth Interrogatory:

Did Mr. E. C. Johnson, at that time, agree to pay for the repairs to your automobile? If so, has he paid for them?

Fifteenth Interrogatory:

What was the actual cost of repairing your automobile?

Welfair J. Mashburn, Jr.
ATTORNEY FOR PLAINTIFF.

STATE OF ALABAMA, 0
 0
COUNTY OF BALDWIN. 0

Before me, James R. Owen, a Notary Public in and for said County and State, personally appeared WELFAIR J. MASHBURN, JR., who is known to me and who, being by me first duly sworn, deposes and says: That he is agent and attorney for the plaintiff, HAROLD E. KAY; that the witness whose testimony is to be taken is a non-resident of the State of Alabama, residing in Mountain View, New Jersey; that the witness, HAROLD E. KAY, is a material witness for the plaintiff and his evidence to be secured by this deposition will be material evidence for the plaintiff on the trial of this cause.

Welfair J. Mashburn, Jr.
ATTORNEY FOR PLAINTIFF

Sworn to and subscribed before me this 31st day of May, 1955.

James R. Owen
NOTARY PUBLIC, BALDWIN COUNTY,
ALABAMA.

The name of CLARENCE S. BIRKMEYER, 350 Madison Avenue, New York 17, New York, 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.

Welfair J. Mashburn, Jr.
ATTORNEY FOR PLAINTIFF.

HAROLD E. KAY,

Plaintiff,

VS.

E. C. JOHNSON,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____

INTERROGATORIES

Now comes the plaintiff in the above styled cause and propounds interrogatories to HAROLD E. KAY, a witness whose testimony, when taken, will be material evidence for the plaintiff on the trial of the above cause.

Interrogatories to HAROLD E. KAY, witness:

First Interrogatory:

What is your name, age, and place of residence?

Second Interrogatory:

Where were you on the 3rd day of October, 1953?

THIRD Interrogatory:

Were you involved in an automobile accident?

Fourth Interrogatory:

If your answer to the preceding interrogatory was "Yes", please explain briefly what happened?

Fifth Interrogatory:

What kind of car were you driving? Give make, model and body type?

Sixth Interrogatory:

What damages, if any, did your car suffer as a result of this accident?

Seventh Interrogatory:

On, or before, the 3rd day of October, 1953, had you bought and/or sold automobiles similar to yours and were you familiar with, or did you know, the reasonable market value of automobiles similar to yours?

Eighth Interrogatory?

What was the reasonable market value of your automobile immediately prior to the accident?

Ninth Interrogatory:

What was the reasonable market value of your automobile immediately after the accident?

Tenth Interrogatory:

Did you talk with the driver of the other vehicle which collided with your automobile, and, if so, did he tell you to whom the vehicle belonged and for whom he was driving?

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Clarence S. Birkmeyer,
350 Madison Avenue,
New York, 17, New York

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Harold E. Kay

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

Harold E. Kay

Commissioner Plaintiff
 and E. C. Johnson

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

Witness 31st day of May, 195 5

Henry J. Clark
 Register.

Commissioner's Fee, \$

Witness' Fees, \$

door was bent and broken, the right rear fender was bent and broken, both front and rear bumpers, on the right side, were bent and broken; plaintiff was deprived of the use of his automobile, which was used in his business, for a long period of time, all to his great damage as aforesaid; hence this suit.

Julian A. Maslbury, Jr.
Attorney for Plaintiff.

Plaintiff respectfully requests that this cause be tried by a jury.

Julian A. Maslbury, Jr.
Attorney for Plaintiff.

Plaintiff is a non-resident, and, therefore, is depositing herewith a cashier's check in the amount of \$25.00, with the Clerk of this Court, as security for the costs of this action.

Julian A. Maslbury, Jr.
Attorney for Plaintiff.