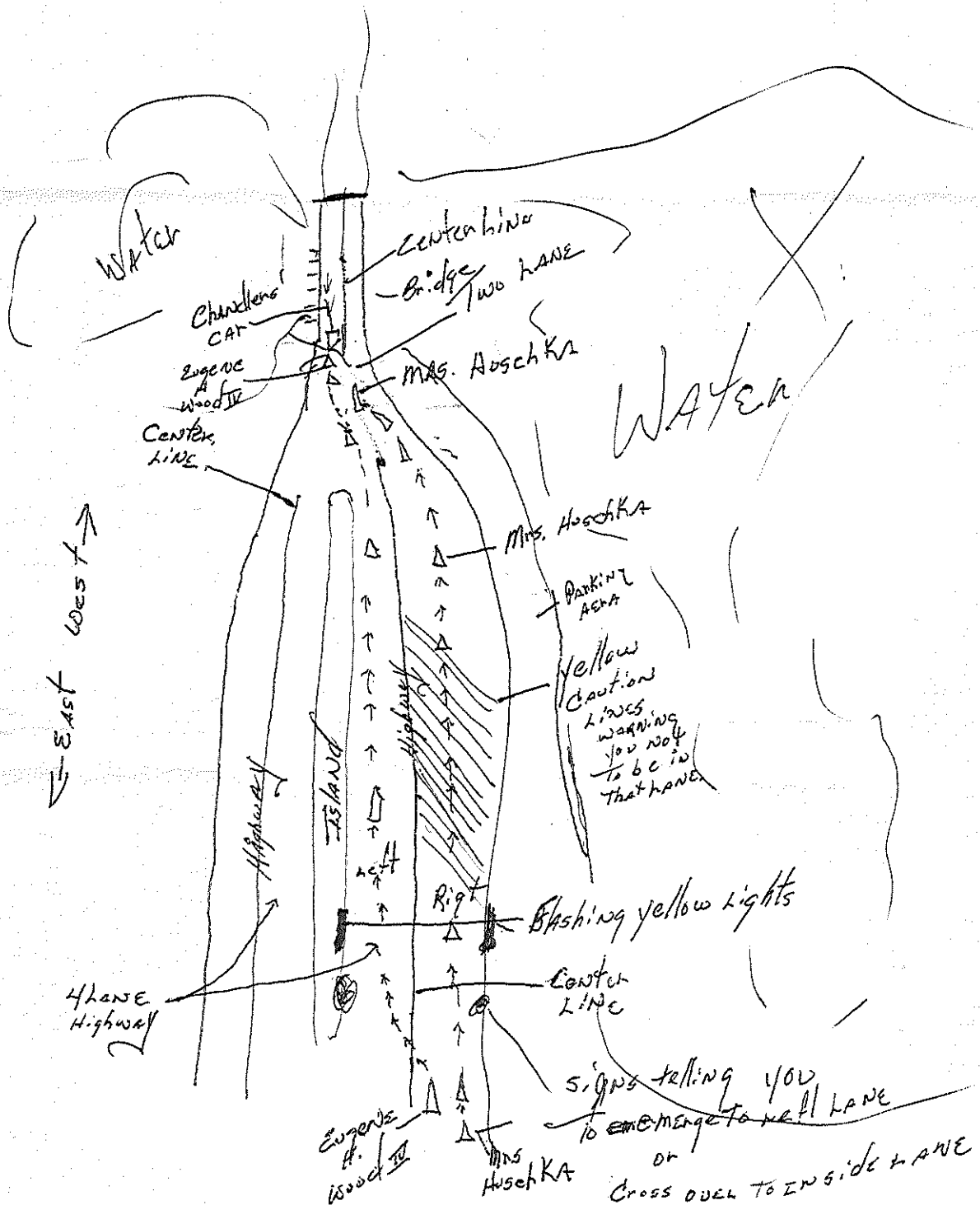


5- (a)



Eugene Harrison Wood II
August 10th, 60

9. (a) I don't understand the question
(b) No, if you mean Mrs. Jones
(c) No
(d) I don't know
(e) I don't know
(f) I don't know
(g) I don't know
10. (a) Mrs. Huschka forced my car across the center line, into the path of Mr. Chandler's car. I am not certain what happened after this
(b) I don't know
(c) Yield the right-of-way
(d) I don't know Mr. Hadley
(e) I don't know
(f) I don't know
(g) Failed to yield the right-of-way
(h) I don't know
(i) I did nothing to cause or contribute to the cause of the accident
(j) I don't know
(k) Failed to yield the right-of-way
(l) I don't know
(m) I don't know
11. (a) I don't know
(b) Mrs. Huschka's car was on my right
(c) Already answered; address not known
(d) I don't know
(e) I don't know
12. (a) None to my knowledge

- (b) N. A.
 - (c) I was not drinking
 - (d) To my knowledge, he was not drinking
 - (e) I was stopped for speeding about two minutes before the accident
 - (f) He said I was speeding and gave me a ticket. I tried to talk him out of it but couldn't. He asked if I were drinking, and I told him no.
 - (g) Sitting in the car.
- 13.
- (a) 40 mph
 - (b) 40-45 mph, but varied
 - (c) 40-45 mph, but varied
 - (d) 40-45 mph, but varied
 - (e) 50-55 mph
 - (f) 50-55 mph
 - (g) 50-55 mph
 - (h) I am not certain Mrs. Huschka's car struck mine
 - (i) I don't understand.
- 14.
- (a) Stopped, or coming to a stop
 - (b) I don't know
 - (c) I don't know
 - (d) I don't know
 - (e) I don't know
 - (f) Coming to a stop, I think
 - (g) Same answer
 - (h) Same answer
 - (i) I don't understand. After we hit, Mr. Chandler was stopped
- 15.
- (a) Chandler was going east. I was going west. I do not know the number of the highway.

- (b) (1) 4-lane highway
 - (2) 4-lane highway
 - (3) I don't know
 - (4) I don't know
 - (5) I don't know
 - (6) I don't know
 - (7) I don't know
 - (8) I don't know
 - (9) 2-lane highway
 - (10) 2-lane highway
 - (11) I don't know
 - (12) I don't know
 - (13) I don't know
 - (c) The Huschka car forced its way to the left
16. (a) Driving at a normal speed, 40-45 mph, but varied speed
- (b) Slowing down to stop
- (c) She slowed and speeded alternately and then forced her car to the left
- (d) Same answer
- (e) Slowed down alternately with Mrs. Huschka
- (f) Same answer
17. (a) I am not sure. I could have.
- (b) About 40, if I applied brakes
- (c) If applied, a few feet
- (d) I don't know
18. (a) Front end
- (b) Front end
- (c) I don't know that it did.
- (d) I don't know that it did
- (e) I don't know

- (f) I don't know
- (g) I don't know
- (h) I don't know
- 19. (a) I don't know
- (b) I don't know
- (c) I don't know
- (d) I don't know
- (e) I don't know
- (f) I don't know
- (g) I don't know
- (h) I don't know
- 20. (a) 40-45 mph, but varied
- (b) 40-45 mph, but varied
- (c) 40-45 mph, but varied
- (d) 40-45 mph, but varied
- (e) 40-45 mph, but varied
- 21. (a) No
- (b) N. A.
- (c) No signal was given
- (d) No signal was given
- (e) No signal was given
- (f) No signal was given
- 22. (a) A car was behind me
- (b) It was behind me
- (c) Mrs. Huschka was the sole cause of the accident
- (d) I am not certain mine and Mrs. Huschka's cars collided,
but, if so, it was her fault
- (e) None that I know of
- (f) No one

- (g) N. A.
- (h) N. A.
- 23. (a) I know nothing about this
- (b) N. A.
- 24. (a) About a week after the accident, I told the patrolman how the accident occurred
- (b) What I have stated herein. In his car.
- (c) Nothing specifically
- (d) N. A.
- (e) No; I did tell Mrs. Huschka to see my lawyer
- (f) While I was in the hospital
- (g) No.
- (h) No.
- (i) Mr. Chandler told me he wasn't hurt. I had just been taken to the hospital
- (j) She came to the hospital and wanted me to sign some papers. I saw one of the papers, and it was a release for her. I told her to see my lawyer. She said 8 others would see me anyway. She got annoyed because I wouldn't sign. She said if it came to court she would swear that I was not speeding. She said I didn't know where I was, and various other things
- (k) In the hospital, Williamson said Mrs. Huschka was in the wrong lane, and forced her way out
- (l) Blalock said the same thing
- (m) Already stated
- (n) Another patient, whose name I do not presently recall, heard Mrs. Huschka. I can ascertain his name
- (o) Two boys were behind me. I don't know their names
- (p) I don't know

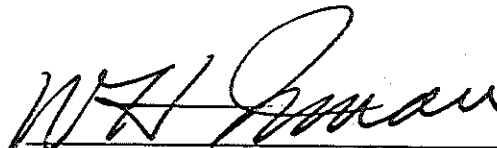
25. (a) Williamson
(b) First time I had driven over it; I had rode over it twice
(c) Not driven before; rode over about two weeks before
(d) Yes
(e) Yes
(f) None
26. (a) Going to football game
(b) Yes
(c) N. A.
(d) Yes
(e) 6 months
(f) Yes
(g) I don't remember exactly
(h) Yes
(i) He drove two separate times
(j) Already answered
(k) Already answered
(l) I don't know
(m) Yes
(n) At the Sea Ranch to eat, and three other times
(o) Already answered. Stopped one time, gave me a ticket


Eugene Harrison Wood, IV

STATE OF TENNESSEE

COUNTY OF HAMBLEN

Sworn to and subscribed before me on this the 11th day of
August, 1960.


Notary Public

My commission expires:

April 14th, 1965

RECORDED TO EUGENE HARRISON WOOD,
IV.

CLARA SHEPPARD JONES,

Plaintiff,

VS.

EUGENE HARRISON WOOD, IV, and
MARTIN W. WILLIAMSON, individually
and jointly,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4187

FILED

AUG 15 1960

ALICE J. DUCK

J. B. BLACKBURN

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

April 8, 1960

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
County Court House
Bay Minette, Alabama

Re: Clara Sheppard Jones
Vs: Eugene Harrison Wood, IV, et al.
Circuit Court of Baldwin County,
At Law, No. 4187

Dear Mrs. Duck:

Please file the inclosed motion and please cause a copy to be served on Mr. J. B. Blackburn, attorney of record for the defendant\$.

I assume that this motion will come up on April 19, 1960, when the demurrer to the complaint is set for a hearing.

Thanking you, I am

Yours very truly,



WILLIAM R. LAUTEN

WRL:mh
Encl. 2

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4187

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EUGENE HARRISON, IV. et al

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

EUGENE HARRISON, IV., et al, Defendant

by CLARA SHEPPARD JONES

, Plaintiff

Witness my hand this 16th day of March 1960

Oliver J. Duck, Clerk

No. 4187

Page

The State of Alabama

Baldwin County

CIRCUIT COURT

CLARA SHEPPARD JONES

Plaintiffs

vs.

EUGENE HARRISON WOOD, IV., et al

Defendants

Summons and Complaint

Filed March 16, 1960

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

Sheriff

I have executed this summons

this 19

by leaving a copy with

Sheriff

Deputy Sheriff

CLARA SHEPPARD JONES,)	IN THE CIRCUIT COURT OF
	(
Plaintiff,)	BALDWIN COUNTY, ALABAMA,
	(
VS.)	AT LAW.
	(
EUGENE HARRISON WOOD, IV,)	NO. 4187
and MARTIN W. WILLIAMSON,	(
individually and jointly,)	
	(
Defendants.)	

INTERROGATORIES TO THE DEFENDANT, EUGENE HARRISON WOOD, IV.

Now comes the Plaintiff in the above styled cause and, pursuant to the provisions of Title 7, Section 477, et seq., of the 1940 Code of Alabama, propounds the following interrogatories to the Defendant, Eugene Harrison Wood, IV, to be answered by him under oath and as provided by law:

1. (a) State your correct name, age, residence address and business address.
- (b) Is your name correctly stated in the complaint on file in this cause?
- (c) If you state that your name is not correctly stated, then state the correct way that you could be designated as a party plaintiff or a party defendant in an action by law;
 - (1) At the time that the accident which is made the basis of this suit occurred;
 - (2) At the time that you answer these interrogatories.
2. (a) Describe completely and in detail the vehicle occupied by you on the occasion of the accident made the basis of this suit, stating in your answer the make, model, year, and body style of same.
- (b) State the name and address of the driver of said motor vehicle on the date of said accident.
- (c) State the name and address of the owner of said motor vehicle on the date of said accident.
- (d) Describe completely and in detail every item of damage sustained by said vehicle.
- (e) Give the amount of each repair estimate obtained on said damage and give the name and address of the person making said repair estimate.
- (f) 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 who made said repairs.

- (g) Describe the condition of the brakes, signal device, steering apparatus, tires, and lighting equipment on said motor vehicle at the time of the accident made the basis of this suit.
 - (h) When had the brakes, signal device, steering apparatus, lights and tires on said motor vehicle last been inspected prior to said accident and by whom?
- 3.
- (a) If you have stated that the owner of the vehicle occupied by you at the time of the accident made the basis of this suit was not the driver on the occasion of said accident, explain fully and in detail the presence of the driver in said vehicle.
 - (b) State who was the employer of the driver of the vehicle occupied by you at the time said accident occurred.
 - (c) State on whose business or behalf said driver was acting at the time that said accident occurred.
- 4.
- (a) State the number of persons occupying the motor vehicle in which you were riding on the occasion of and at the time of said accident, and state specifically how and in what manner each of said occupants were located in said vehicle on said occasion.
 - (b) State the name and address of each person occupying the motor vehicle in which you were riding on the occasion of said accident and at the time of said accident.
 - (c) State fully the purpose of the trip you were making at the time of the accident made the basis of this suit.
 - (d) From what point had you departed?
 - (e) What was your destination?
 - (f) Were you performing a mission, errand, or duty for anybody whatsoever? If so, state the nature of same and the name and address of the person for whom you were performing it.
 - (g) Give the name and address of each and every person or firm who had any interest whatsoever in the trip that was being made by the driver of the vehicle in which you were riding on the occasion of and at the time of said accident made the basis of this suit, and state the nature of said interest and the connection of said person or firm with the trip.
5. Prepare and attach to your answers to these interrogatories a map portraying the scene of the accident and the physical objects involved in the accident made the basis of this suit and designate on said map the following:
- (a) The point of impact and skid marks leading up to and from same;
all
 - (b) The resting place of the vehicles involved in the accident in any way after the accident occurred.
 - (c) The placement of any other vehicles or physical objects which had anything to do with said accident.

6. (a) Describe the locus of the accident with reference to the contour of the land, the grade or curve of the road or highway, and any physical structures located within 200 yards of the place of the accident and where the vehicle in which you were riding came to rest immediately after the accident.
- (b) Describe any traffic controls, signals or traffic signs located within 200 yards of the scene of the accident and within 200 yards of where the vehicle occupied by you came to rest immediately after the accident, and the operation of such controls, signals or traffic signs, stating the directions in which said traffic controls, signals or traffic signs faced, and where such controls, signals or traffic signs were located.
7. (a) State where the motor vehicle in which Mr. Malcolm Chandler was riding was located with reference to the point of the impact of Mr. Chandler's automobile with the automobile occupied by you when you first observed Mr. Chandler's vehicle immediately prior to said accident.
- (b) Did you see the motor vehicle in which Mr. Malcolm Chandler was riding before the actual collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler?
- (c) How many feet was the motor vehicle in which Mr. Malcolm Chandler was riding from the place of said collision when you first observed same.
- (d) How many feet were you from the point of said impact when you first observed the vehicle in which Mr. Malcolm Chandler was riding?
- (e) Where did said impact occur with reference to the center line of the street or highway on which the vehicle in which Mr. Malcolm Chandler was traveling?
- (f) Where did said impact occur with reference to the right edge of the street or highway on which the vehicle driven or occupied by you was traveling?
8. (a) State where the motor vehicle in which Mrs. Cynthia Huschka was riding was located with reference to the point of the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Huschka when you first observed said motor vehicle occupied by Mrs. Huschka immediately prior to said accident.
- (b) Did you see the motor vehicle in which Mrs. Cynthia Huschka was riding before the actual collision of the vehicle occupied by you with the vehicle occupied by Mrs. Huschka?
- (c) How many feet was the motor vehicle in which Mrs. Cynthia Huschka was riding from the place of said impact when you first observed same?
- (d) How many feet were you from the point of said impact when you first observed the vehicle in which Mrs. Cynthia Huschka was riding?
- (e) Where did said impact with the automobile in which Mrs. Cynthia Huschka was riding occur with reference to the center line of the street or highway on which the vehicle occupied by Mrs. Cynthia Huschka was traveling?

LAW OFFICES

J. Terry Reynolds, Jr.

AND

William R. Lauten

1ST NAT'L BANK BLDG.
MOBILE, ALA.

- (f) Where did the impact with the automobile operated by Mrs. Cynthia Huschka occur with reference to the right edge of the street or highway on which the vehicle occupied by you was traveling.
9. (a) State where the motor vehicle in which the plaintiff was riding was located with reference to the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler when you first observed the automobile in which the plaintiff was riding immediately prior to the accident.
- (b) Did you see the motor vehicle in which the plaintiff was riding before the actual collision with the automobile occupied by Mr. Malcolm Chandler?
- (c) Did you see the motor vehicle in which the plaintiff was riding before the actual impact of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka?
- (d) How many feet was the motor vehicle in which the plaintiff was riding from the place of the impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler when you first observed the motor vehicle in which the plaintiff was riding?
- (e) How many feet was the motor vehicle in which the plaintiff was riding from the place of the impact of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka when you first observed the motor vehicle in which the plaintiff was riding?
- (f) How many feet were you from the point of impact with the automobile occupied by Mr. Malcolm Chandler when you first observed the vehicle in which the plaintiff was riding?
- (g) How many feet were you from the point of impact with the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka when you first observed the automobile in which the plaintiff was riding?
10. (a) 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 same as seen by you.
- (b) Describe each and everything which the driver of the vehicle occupied by Mr. Malcolm Chandler failed to do to avoid said accident.
- (c) Describe each and everything which the driver of the vehicle occupied by Mrs. Cynthia Huschka failed to do to avoid said accident.
- (d) Describe each and everything which the driver of the vehicle occupied by Mr. John T. Hadley failed to do to avoid said accident.
- (e) Describe each and everything which the driver of the vehicle occupied by the plaintiff failed to do to avoid said accident.

- (f) Describe each and everything done by the driver of the vehicle occupied by Mr. Malcolm Chandler which contributed to ^{the} cause of said accident.
 - (g) Describe each and everything done by the driver of the vehicle occupied by Mrs. Cynthia Huschka which contributed to the cause of said accident.
 - (h) Describe each and everything done by the driver of the vehicle occupied by Mr. John T. Hadley which contributed to the cause of said accident.
 - (i) State each and everything done by you or which you omitted to do, which contributed proximately to the cause of the accident.
 - (j) Describe each negligent act or omission of the driver of the vehicle occupied by Mr. Malcolm Chandler on said occasion.
 - (k) Describe each negligent act or omission of the driver of the vehicle occupied by Mrs. Cynthia Huschka on said occasion.
 - (l) Describe each negligent act or omission of the driver of the vehicle occupied by Mr. John T. Hadley on said occasion.
 - (m) Describe each negligent act or omission of the driver of the vehicle in which the plaintiff was riding on said occasion.
- 11.
- (a) Describe each and everything which the driver of any other vehicle involved in the accident failed to do to avoid said accident.
 - (b) State specifically where each of the automobiles driven by any of such persons was located at the time of the initial impact of your automobile with that of Mr. Malcolm Chandler.
 - (c) State the name and address of each such driver which you say failed to do anything to avoid said accident.
 - (d) Describe each and everything done by any other driver of any other vehicle involved in the accident which contributed to the cause of said accident.
 - (e) Describe each negligent act or omission of the driver of any other vehicle involved in the accident which contributed to or caused the accident.
- 12.
- (a) State whether any of the occupants (including yourself) in any of the vehicles involved in the accident made the basis of this suit were intoxicated or were under the influence of intoxicating beverages to any degree at the time of the accident.
 - (b) Please state the name and address of each of said persons who was intoxicated or was under the influence of any intoxicating beverages at said time.
 - (c) State what you had been drinking, in the way of intoxicating beverages prior to the accident, where you had obtained the same, the quantity or amount consumed, and the time and place where same was drunk.

- (d) State what Mr. Martin W. Williamson had been drinking in the way of intoxicating beverages prior to the accident, where he had obtained the same, the quantity or amount consumed by him, and the time and place where the same was drunk.
 - (e) State whether the automobile occupied by you had been stopped by the Alabama Highway Patrol shortly prior to the accident, and, if so, please state where the automobile occupied by you was located at such time, and the name and address of the driver of the automobile occupied by you at the time it was stopped by the Highway Patrol.
 - (f) Please state what was said by any of the occupants of the automobile in which you were riding at the time of the accident in the presence of the Highway Patrol officer immediately after the automobile occupied by you was stopped by the Highway Patrol just before the accident and what was said by the Highway Patrol officer in your presence.
 - (g) State fully what each of the occupants of the automobile occupied by you was doing at the time it was stopped by the Highway Patrol just prior to the accident.
13. State, according to your best judgment, the speed of the vehicle occupied by Mrs. Cynthia Huschka 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 of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (c) At a point 200 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (d) At a point 100 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (e) At a point 50 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (f) At a point 25 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (g) At a point 10 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (h) At the time of the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka;
 - (i) Immediately after the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka.

14. State, according to your best judgment, the speed of the vehicle occupied by Mr. Malcolm Chandler 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 of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
- (c) At a point 200 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
- (d) At a point 100 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
- (e) At a point 50 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
- (f) At a point 25 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
- (g) At a point 10 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
- (h) At the time of the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler;
- (i) Immediately after the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler.

- 15.
- (a) State in what direction and along what highway each of the motor vehicles involved in the accident made the basis of this suit was traveling on the occasion of said accident.
 - (b) State in your best judgment, in number of feet, the width of such highway, at the following points:
 - (1) 300 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (2) 200 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (3) 100 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (4) 50 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (5) 25 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (6) 10 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;

- (7) At the time of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
 - (8) Immediately after the impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
 - (9) 200 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (10) 100 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (11) 50 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (12) 25 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (13) 10 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
 - (c) If any of the vehicles involved in the accident made the basis of this suit was engaged in making a turn from the direct line of travel (including passing another vehicle), describe same, and the course followed with reference to the center line or what would be the center of the traveled portion of the highway on which such vehicle was traveling prior to such turn or prior to such passing.
16. (a) State fully, specifically and in detail each and every act or thing done by the driver of the automobile occupied by you at the time of the accident made the basis of this suit during the last 200 feet of the approach of the vehicle occupied by you to the point of collision with the automobile occupied by Mr. Malcolm Chandler, stating in your answer the chronological order in which the driver of said vehicle occupied by you did each of said acts or things.
- (b) Describe each change in the course of travel made by the vehicle occupied by Mr. Malcolm Chandler immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Chandler.
- (c) Describe each change in the course of travel made by the vehicle occupied by Mrs. Cynthia Huschka immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mrs. Huschka.
- (d) Describe each change in the course of travel made by the vehicle occupied by Mrs. Cynthia Huschka immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (e) Describe each change in the course of travel made by the vehicle occupied by you immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.

LAW OFFICES

J. Terry Reynolds, Jr.

AND

William R. Lauten

1ST NAT'L BANK BLDG.

MOBILE, ALA.

travel

- (f) Describe each change in the course of/made by the vehicle occupied by you immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.
17. (a) State whether or not the brakes on the vehicle occupied by you at the time of the accident sued on were applied prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (b) If so, state in your best judgment the speed in miles per hour the vehicle occupied by you was traveling at the moment the brakes were applied.
- (c) State in your best judgment the distance in number of feet the vehicle occupied by you traveled from the moment the brakes were applied until the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler occurred.
- (d) State in your best judgment the distance in number of feet the vehicle occupied by you traveled from the moment the brakes were applied until it came to a stop after the occurrence of the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
18. (a) State specifically what portion of the vehicle occupied by you first came in contact with the vehicle occupied by Mr. Malcolm Chandler.
- (b) State specifically what portion of the vehicle occupied by Mr. Malcolm Chandler first came in contact with the vehicle occupied by you.
- (c) State specifically what portion of the vehicle occupied by you first came in contact with the vehicle occupied by Mrs. Cynthia Huschka.
- (d) State specifically what portion of the vehicle occupied by Mrs. Cynthia Huschka first came in contact with the vehicle occupied by you.
- (e) After the initial impact involving the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler, describe what portion of the automobile occupied by you next came in contact with the automobile occupied by Mr. Malcolm Chandler.
- (f) After the initial impact involving the vehicle occupied by Mr. Malcolm Chandler with the vehicle occupied by you, describe what portion of the automobile occupied by Mr. Malcolm Chandler next came in contact with the automobile occupied by you.
- (g) After the initial impact involving the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka, describe what portion of the automobile occupied by you next came in contact with the automobile occupied by Mrs. Cynthia Huschka.
- (h) After the initial impact involving the vehicle occupied by Mrs. Cynthia Huschka with the vehicle occupied by you, describe what portion of the automobile occupied by Mrs. Cynthia Huschka next came in contact with the automobile occupied by you.

19. (a) 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.
- (b) In what direction did each of said motor vehicles move from the point of said collision until they came to a complete stop?
- (c) Describe each and every skid mark which led up to the point of collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (d) Describe each and every skid mark which led up to the point of collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.
- (e) Describe each and every skid mark which extended from the point of collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler toward the place where either of such motor vehicles came to rest.
- (f) Describe each and every skid mark which extended from the point of collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka toward the place where either of such motor vehicles came to rest.
- (g) Locate the point where each motor vehicle came to rest with reference to the point of impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler, the center of the highway, the end of the bridge, and the right edge of the highway on which each of such motor vehicles had been traveling.
- (h) Locate the point where each motor vehicle came to rest with reference to the point of impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka, the center of the highway, the end of the bridge, and the right edge of the highway on which each of such motor vehicles had been traveling.

20. State the speed of the motor vehicle occupied by you, according to your best judgment at the following points:
- (a) When you were within a distance of 300 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (b) When you were within a distance of 200 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (c) When you were within a distance of 100 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (d) When you were within a distance of 50 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (e) When you were within a distance of 25 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.

21. (a) State whether any horn or 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.
- (b) If so, describe each of said signals given by each respective driver specifically and in detail.
- (c) State how far distant from the point of collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler each vehicle was located at the time said signal was given.
- (d) State how far distant from the point of collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka each vehicle was located from the time said signal was given.
- (e) If any signals for stopping or turning were given by the driver of any of the vehicles involved in the accident immediately prior to the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler, describe same, and state how far distant from the point of such impact each said signal was given by each driver respectively.
- (f) If any signals for stopping or turning were given by either driver immediately prior to the collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka, describe same, and state how far distant from the point of such impact each said signal was given by each driver respectively.
22. (a) 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.
- (b) If so, state the number of such other vehicles and where they were located with reference to the point of the accident at the east end of the Tensaw River bridge at the moment the same occurred.
- (c) 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 of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
- (d) 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 of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka.
- (e) Please state fully and in detail in what manner any such other vehicles located at or near the scene of the accident played any part or contributed in any manner, to cause the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
- (f) Please state fully and in detail in what manner any such other vehicles located at or near the scene of the accident played any part or contributed in any manner, to cause the collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka.

- (g) Give the name and address of each driver or owner of each of such other vehicles which contributed in any manner to cause the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (h) Give the name and address of each driver or owner of each of such other vehicles which contributed in any manner to cause the collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.
23. (a) State whether or not any vehicle other than the one occupied by you played any part, or contributed in any manner, to cause the collision of the automobile occupied by the plaintiff with that occupied by Mr. John T. Hadley.
- (b) If your answer to 23(a) is in the affirmative, please state the name and address of the driver or owner of such vehicle, and describe fully how and in what manner each of such other vehicles contributed in any manner to cause the collision of the automobile occupied by the plaintiff with that occupied by John T. Hadley, and state where each of such vehicles were located at such time and the direction each such vehicle was traveling.
24. (a) Did you make any statements to the Highway Patrol officer investigating the accident following the occurrence of the collisions of the automobile occupied by you with those occupied by Mr. Malcolm Chandler and Mrs. Cynthia Huschka?
- (b) If so, state when, where and what was said by you.
- (c) Did the Highway Patrol officer investigating the accident involving the collision of the automobile occupied by you with those occupied by Mr. Malcolm Chandler and Mrs. Cynthia Huschka make any statement in your presence following the occurrence of such collision?
- (d) If so, state when, where and what was said by said Highway Patrol officer in your presence.
- (e) Did you make any statements 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?
- (f) If so, state when, where and what was said by you.
- (g) Did the plaintiff make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the plaintiff.
- (h) Did the driver of the automobile in which the plaintiff was riding make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of the vehicle in which the plaintiff was riding?
- (i) Did the driver of the vehicle occupied by Mr. Malcolm Chandler make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of such vehicle?

LAW OFFICES

J. Terry Reynolds, Jr.

AND

William R. Lauten

1ST NAT'L BANK BLDG.

MOBILE, ALA.

- (j) Did the driver of the vehicle occupied by Mrs. Cynthia Huschka make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of such vehicle?
 - (k) Did Mr. Martin W. Williamson make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by Martin W. Williamson?
 - (l) Did any other occupant of the automobile occupied by you make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by such other person, and who such other person was?
 - (m) Did the occupant of any vehicle involved in the accident in any manner make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by such other person, and who such other person was and in what vehicle such other person was riding at the time of the accident?
 - (n) Give the name and address of each and every person who was present at each time any such statements were made either by you, or by the driver of the vehicle in which the plaintiff was riding or by the driver of any other of the vehicles or by any of the occupants of any of the vehicles in any manner involved in the accident, following the occurrence of said accident.
 - (o) Give the name and address of each and every person who was present when the accident made the basis of this suit occurred.
 - (p) Give the name and address of each and every person who was present at the time of the collision of the automobile in which the plaintiff was riding with the automobile occupied by Mr. John T. Hadley.
- 25.
- (a) Who gave you permission to use the automobile you were driving on the occasion when you had the accident made the basis of this suit?
 - (b) Please state how many times you had driven an automobile or had ridden in an automobile prior to the accident on U. S. Highway 31 from a point 300 feet east of where the accident occurred to the point of the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
 - (c) Please state how many times and when such times occurred when you had driven over such portion of said highway.
 - (d) Please state whether you were familiar with the portion of the highway 300 feet east from the point of the impact to the place where the collision occurred involving the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
 - (e) Please state whether or not you were familiar with the portion of U. S. Highway 31, 300 feet east of the Tensaw River bridge to the east end of said bridge.
 - (f) If so, how many times had you driven an automobile over such portion of said highway.

26. (a) Please state the purpose of your trip being made by the occupants of the vehicle occupied by you at the time the accident made the basis of this suit occurred.
- (b) Were the occupants of the vehicle in which you were riding all on their way to the football game at Ladd Memorial Stadium between Alabama and Tulane?
- (c) If your answer to the foregoing is in the negative, please state where each of the occupants of the vehicle occupied by you were going at the time said accident occurred.
- (d) Were you a friend of or acquainted with Martin W. Williamson at the time of the accident?
- (e) If your answer to the foregoing is in the affirmative, please state how long you had known Martin W. Williamson and where you had known him prior to the accident.
- (f) Please state whether Martin W. Williamson gave you permission or authorized you to operate the automobile occupied by you at the time of the accident made the basis of this suit.
- (g) If your answer to the foregoing is in the affirmative, please state when and where you were so authorized, and when and where you started driving the automobile prior to the accident made the basis of this suit.
- (h) Please state whether Martin W. Williamson was driving the automobile at any time between Bay Minette, Alabama, and Mobile, Alabama, prior to the collision made the basis of this suit.
- (i) If your answer to the foregoing is in the affirmative, please state when and where and along what route Martin W. Williamson drove said automobile between Bay Minette and Mobile prior to said collision.
- (j) Did you see the automobile occupied by Mrs. Cynthia Huschka at any time while the vehicle occupied by you was between Bay Minette and the place where the collision occurred prior to the collision?
- (k) If your answer to the foregoing question is in the affirmative, please state when and where you saw the automobile occupied by Mrs. Cynthia Huschka prior to the accident, and where it was located each time you saw it with reference to the automobile occupied by you.
- (l) What time did you leave Bay Minette prior to the time the accident occurred?
- (m) Did the vehicle occupied by you make any stops on your way to Mobile from Bay Minette prior to the time of the accident?
- (n) If your answer to the foregoing is in the affirmative, please state when and where such stops were made and state the purpose of each such stops.
- (o) Please state whether the automobile occupied by you at the

LAW OFFICES

J. Terry Reynolds, Jr.

AND

William R. Lauten

1ST NAT'L BANK BLDG.

MOBILE, ALA.

time of its collision with the automobile occupied by Mr. Malcolm Chandler was stopped on the day of the accident by an Alabama Highway Patrol officer prior to the time the accident occurred and, if so, please state what was said and done by the Highway Patrol officer in your presence at each such time, what was said and done by you, by Martin W. Williamson and by Dawson Blalock, in your presence and ^{on} each occasion, when and where each such stop occurred, and the name of such Highway Patrol officer, and what you, Martin Williamson and Dawson Blalock were each doing immediately prior to each such stop.

J. Terry Reynolds, Jr.
William R. Lauten
Attorneys for Plaintiff

STATE OF ALABAMA)
)
COUNTY OF MOBILE)

Before me, the undersigned authority in and for said County in said State, personally appeared William R. Lauten, who, having been by me first duly sworn, deposes and says that he is one of the attorneys for the Plaintiff in the above styled cause, and that, if the foregoing interrogatories are truthfully answered, the answers will be material evidence for the Plaintiff on a trial of this case.

William R. Lauten
Affiant

Sworn to and subscribed before me on this
11th day of March, 1960.

Miriam G. Hill
Notary Public, Mobile County, Alabama.

NOTE TO SHERIFF:

Please serve the defendant, Eugene Harrison Wood, IV, with a copy of these interrogatories, by personal service of a copy of such interrogatories on him at 417 Battery Avenue, Selma, Alabama, and please also serve a copy of such interrogatories on his father, Eugene Harrison Wood, III, 417 Battery Avenue, Selma, Alabama.

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

February 16, 1960

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
County Court House
Bay Minette, Alabama

Re: Clara Sheppard Jones
Vs: Eugene Harrison Wood, IV, and
Martin W. Williamson,
Circuit Court of Baldwin County,
Alabama, Law Side.

Dear Mrs. Duck:

Enclosed herewith please find the original and three copies of the complaint in the above case. We represent the plaintiff. Please prepare a summons for each defendant. The defendant, Eugene Harrison Wood, IV, is a minor of the age of twenty years. He is living in Selma, Dallas County, Alabama, at 417 Battery Avenue. Please have the sheriff of Dallas County, Alabama, serve a copy of the summons and complaint on Eugene Harrison Wood, IV, personally, and also have the sheriff of Dallas County, Alabama, serve a copy of the summons and complaint to Eugene Harrison Wood, IV on his father, Eugene Harrison Wood, III, who resides at the same address.

In other words, please make two copies of the summons for Eugene Harrison Wood, IV, and have one of them served on him personally and one of them served on his father, so the service will comply with Title 7, Section 194, Code of Alabama, 1940. Please have the sheriff of Baldwin County serve the summons to Martin W. Williamson and a copy of the complaint on him at Bay Minette, Alabama.

For your convenience I am enclosing herewith a copy of this letter for the use of the sheriff of Baldwin County and a copy of this letter for the use of the sheriff of Dallas County. Please file the original of this letter in the court file, and kindly advise us when service has been perfected on the defendants and in what manner.

Thanking you for this and for your past courtesies, I am

Yours very truly,


WILLIAM R. LAUTEN

WRL:mh

Encl. 6

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

June 24, 1960

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
County Court House
Bay Minette, Alabama

Re: Clara Sheppard Jones
Vs: Eugene Harrison Wood, IV, et al.
Circuit Court of Baldwin County,
Alabama, At Law, No. 4198
4137

Dear Mrs. Duck:

Please advise us when the interrogatories which were propounded to the defendant, Eugene Harrison Wood, IV, were served and please advise us upon whom they were served.

Thanking you for this information, I am

Yours very truly,


WILLIAM R. LAUTEN

WRL:mb

P.S.: Enclosed herewith is a stamped, self-addressed envelope for your convenience in making your reply.



WRL

Encl. 1

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

April 1, 1960

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
County Court House
Bay Minette, Alabama

Re: Clara Sheppard Jones
Vs: Eugene Harrison Wood, IV, et al.
Circuit Court of Baldwin County,
Alabama, Law Side, No. 4187

Dear Mrs. Duck:

Mr. J. B. Blackburn has appeared for the defendants in this case. Will you please have a copy of the interrogatories propounded to Eugene Harrison Wood, IV, and the summons to answer these interrogatories served on Mr. J. B. Blackburn, attorney of record for Eugene Harrison Wood, IV, and kindly advise us when the interrogatories have been served on Mr. Blackburn.

Thanking you, I am

Yours very truly,


WILLIAM R. LAUTEN

WRL:mh

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

July 5, 1960

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
County Court House
Bay Minette, Alabama

Re: Clara Sheppard Jones,
Vs: Eugene Harrison Wood, IV, et al.
Case No. 4187

Dear Mrs. Duck:

I enclose herewith two motions in the above case, one to require the defendant, Martin W. Williamson to answer the interrogatories propounded to him, and the other to require the defendant, Eugene Harrison Wood, IV, to answer the interrogatories propounded to him. I assume these motions will come on to be heard the next pleading day which I understand is Tuesday, July 19, 1960.

Will you please file the motions and have a copy of them served on the attorney for the defendants, Mr. J. B. Blackburn?

Yours very truly,


WILLIAM R. LAUTEN

WRL:mh

Enclosures

cc: Mr. J. B. Blackburn
Attorney at Law
Bay Minette, Alabama

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

April 25, 1960

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
County Court House
Bay Minette, Alabama

Re: Clara Sheppard Jones
vs: Eugene Harrison Wood, IV,
and Martin W. Williamson,
Circuit Court of Baldwin County,
Alabama, Law Side, No. 4187.

Dear Mrs. Duck:

I enclose herewith the original and one copy of interrogatories propounded to one of the Defendants in the above styled case, Martin W. Williamson. Will you please file the original and have the sheriff serve the copy on Mr. J. B. Blackburn, attorney of record for the defendant?

Thanking you, I am

Yours very truly,


WILLIAM R. LAUTEN

WRL:mh

M.4187

Clark

Shippard Jones

JURY LIST - FALL SESSION

SEPTEMBER 12, 1960

Eugene Harrison Wood

1. ~~Bowie, William E., Laborer, Robertsdale~~
2. ~~Bryant, Woodrow, Farmer, Stockton~~
3. ~~Emmons, Isaac, Farmer, Silverhill~~
4. ~~Bauer, John, Farmer, Summerdale~~
5. ~~Clark, H.L., Brookley Field, Bay Minette~~
6. ~~Allegri, V.L., Jr., Farmer, Belforest~~
7. ~~Lovell, M.A., JR., Farmer, Loxley~~
8. ~~Eliland, Clarence S., Millman, Bay Minette~~
9. ~~Cooper, Quitman, Bldg. Supply Dealer, Gulf Shores~~
10. ~~Dawing, Rudolph A., Merchant, Foley~~
11. ~~Davidson, Jerry, Ala. Power Co., Bay Minette~~
12. ~~Durant, Joe C., Farmer, Bay Minette~~
13. ~~Durant, Percy N., Merchant, Bay Minette~~
14. ~~Dutcher, Wilson, Jeweler, Fairhope~~
15. ~~Dyckew, Joseph, Merchant, Silverhill~~
16. ~~Dyass, Albert, Merchant, Stapleton~~
17. ~~Laurendine, Leonard, Farmer, Mag. Spgs.~~
18. ~~Lynene, George A., Farmer, Silverhill~~
19. ~~Malone, T.E., Merchant, Fairhope~~
20. ~~Mason, Jimmy, Salesman, Fairhope~~
21. ~~Mathews, Charles H., Furniture, Bay Minette~~
22. ~~McKenzie, Elroy, JR., Farmer, Fairhope~~
23. ~~Mitchel, Fred, Jr., Service Station, Stapleton~~
24. ~~Mosley, A.A., Builder, Stapleton~~
25. ~~Murphy, William R., Plant Manager, Robertsdale~~
26. ~~Owen, I.D., Jr., Merchant, Bay Minette~~
27. ~~Pearson, Donald, Farmer, Robertsdale~~
28. ~~Roberts, Howard, Civil Service, Stapleton~~
29. ~~Simmon, Arthur, Farmer, Belforest~~
30. ~~Simmon, A.D., Farmer, Daphne~~
31. ~~Schroeder, Walter, Painter, Elberta~~
32. ~~Sheldon, Edward, Brick Layer, Fairhope~~
33. ~~Stripline, Fred, Television Repair, Robertsdale~~
34. ~~Strake, Fred, Trucker, Robertsdale~~
35. ~~Juddith, Jack, Office Manager, Bay Minette~~
36. ~~Frawick, Walter, Laborer, Bay Minette~~
37. ~~Vasut, Charles P., Television Repair, Robertsdale~~
38. ~~Waters, Orville Clyde, Merchant, Bay Minette~~
39. ~~Bowell, Devore, Businessman, Loxley~~
40. ~~Dund, Geoffrey, Chemist, Spanish Fort - Daphne~~
41. ~~Cooper, Nolan, Jr., Farmer, Robertsdale~~
42. ~~Alexander, W. Silsby, Jr., Plumber, Bay Minette~~
43. ~~Langston, Shelby, Brookley Field, Bay Minette~~
44. ~~Crawford, Russell M., Electrician, Bay Minette~~
45. ~~Howard, Oscar, Merchant, Bay Minette~~
46. ~~Johnson, Manford, Newport, Bay Minette~~
47. ~~Walker, W. Kirby, Railroad, Bay Minette~~
48. ~~Gray, Cane P., Oil Distributor, Bay Minette~~
49. ~~Wrenn, Walter P., Fleet, Bay Minette~~
50. ~~Zehner, Charles K., Health Dept., Bay Minette~~
51. ~~Murrah, Wendel A., Production, Bay Minette~~
52. ~~Meerer, Uhle, Newport, Bay Minette~~
53. ~~Miller, Ernest, Ala. Power Co., Bay Minette~~
54. ~~McKinney, Fred, A.P.C., Bay Minette~~
55. ~~McGill, Jake M., Insurance, Bay Minette~~
56. ~~Lynd, Joe E., Plumber, Bay Minette~~
57. ~~Knight, Robert W., Clerk, Bay Minette~~
58. ~~Lyles, O.C., Real Estate, Bay Minette~~
59. ~~Easley, Ted, Baldwin Pole & Piling Co., Bay Minette~~

P XXXXX XXXXX XXXXX

D XXXXX XXXXX XXXXX

31

RECEIPT FOR ORIGINAL MEDICAL RECORD

Date September 16, 1960

Received of the MOBILE INFIRMARY medical record No. 146860, consisting of a total of 25 sheets, for Jones, Mrs. Clara F. (Name of Patient)

1 Personal Identification & Summary Sheet

1 History Sheet

1 Physical Examination Sheet

1 Diagnosis and Progress Record Sheet

1 Electrocardiographic Reports

2 X-Ray Reports

1 Laboratory Report Sheet

2 Hematology

1 Urinalysis

1 Bio-Chemistry

1 Bacteriology

1 Spinal Fluid & Miscellaneous

1 Blood Bank

1 Other:

OTHER FORMS OR RECORDS:

1 Consultation Record

1 Physiotherapy "

1 Physical Therapy "

1 Blood Pressure "

2 Blood Transfusion "

7 Nurses' Record Sheets
(12 pages)

TOTAL SHEETS 25

+ 1 Emergency Ward Card

26 Grand Total

1 Reports of Anesthesia

1 Operative Records

1 Pathology Reports

2 Treatment Records (Physicians' Orders)

3 Graphic Charts

1 Nurses' Record Sheets

1 Patient's Clothes List

This record will be returned to the MOBILE INFIRMARY, marked for the attention of the Medical Record Librarian (state when)

SIGNED:

Heide J. Smith
clerk

CLARA SHEPPARD JONES,

VS.

Plaintiff,

EUGENE HARRISON WOOD, IV,
and MARTIN W. WILLIAMSON,
individually and jointly,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4187

ORDER APPOINTING GUARDIAN AD LITEM

In this cause it appears that the defendant, Eugene Harrison Wood, IV, is a minor under twenty-one years of age, and that he has not to date nominated a guardian ad litem to represent him in this proceeding.

It further appears to the Court that J. B. Blackburn of Bay Minette, Alabama, who has previously appeared in this cause as attorney for the defendants, is in all respects a fit and proper person to be appointed guardian ad litem to represent the said defendant and to protect his interests in this cause.

It is, therefore, ORDERED AND ADJUDGED that J. B. Blackburn be and he is hereby appointed as guardian ad litem to represent the said defendant in this proceeding.

ORDERED AND ADJUDGED on this the 16th day of September, 1960.

Hubert M. Jace
Judge

ACCEPTANCE AND ANSWER OF
GUARDIAN AD LITEM

I, J. B. Blackburn, do hereby accept appointment as guardian ad litem for the defendant, Eugene Harrison Wood, IV, and adopt as pleadings as his guardian ad litem the pleadings heretofore filed by the defendants in this cause.

Dated this 16th day of September, 1960.

J. B. Blackburn
Guardian ad Litem

FILED
SEP 22 1960
CLERK
REGISTER

ORDER APPOINTING GUARDIAN AD
LITEM, ACCEPTANCE AND ANSWER OF
GUARDIAN AD LITEM.

CLARA SHEPPARD JONES,

VS.

Plaintiff,

EUGENE HARRISON WOOD, IV, ET AL.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4187

FILED
SEP 22 1960
AUGUST DUCK, CLERK
REGISTER

CLARA SHEPPARD JONES,

Plaintiff,

VS.

EUGENE HARRISON WOOD, IV,
and MARTIN W. WILLIAMSON,
individually and jointly,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4187

DEMURRER TO AMENDED COMPLAINT

Now come the defendants and each of the defendants, separately and severally, and demur to the complaint as last amended (the amended complaint filed on August 16, 1960) and as grounds of such demurrer assign, separately and severally, the following:

1. It does not state a cause of action.
2. No facts are alleged on which the relief sought can be granted.
3. The allegations of the complaint are conclusions of the pleader.
4. The allegations of the complaint are vague, indefinite and uncertain.
5. No facts are alleged to show where the plaintiff was injured.
6. The allegations of the complaint are vague, indefinite and uncertain and no facts are alleged to show where the car was located in which the plaintiff was riding at the time of her alleged injury.
7. The allegations of the complaint are conclusions of the pleader and no facts are alleged to show that the alleged negligence, as set out in the complaint, was the proximate cause of the plaintiff's alleged injuries.
8. The location of the accident in which the plaintiff was injured is not described with sufficient certainty.
9. The allegations of the complaint are conclusions of the pleader and no facts are alleged to show that the plaintiff's

alleged injuries were caused by the negligence of the defendants, or either of them.

10. The allegations of the complaint are so vague, indefinite and uncertain that it is impossible to determine therefrom how the plaintiff was injured.

11. No facts are alleged to show that the defendants' alleged negligence was the proximate cause of the plaintiff's alleged injuries and damages.

12. The allegations of the complaint are inconsistent and confusing.

13. The allegations of the complaint do not charge actionable negligence on the part of either of the said defendants.

14. The allegations of the complaint, with respect to plaintiff's alleged damages, are so vague, indefinite and uncertain that they do not apprise the defendants of what they will be called upon to defend.

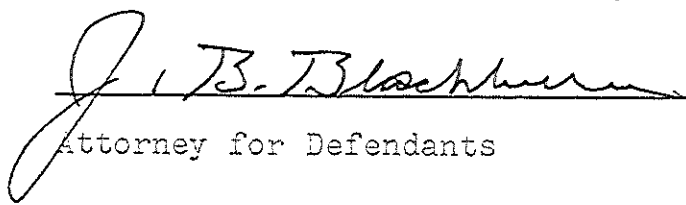
15. No facts are alleged to show any causal connection between the defendants' alleged negligence and the plaintiff's alleged damages.

16. The facts alleged do not show any connection between the defendants' alleged negligence and the plaintiff's alleged damages.

17. No facts are alleged to show that the defendants' alleged negligence was the proximate cause of the plaintiff's alleged damages.

18. No facts are alleged to show that the plaintiff was injured in Baldwin County, Alabama.

19. No facts are alleged to show that the accident in which the plaintiff was injured occurred in Baldwin County, Alabama.


Attorney for Defendants

Filed
8-16-60

DEMURRER TO AMENDED COMPLAINT

CLARA SHEPPARD JONES,

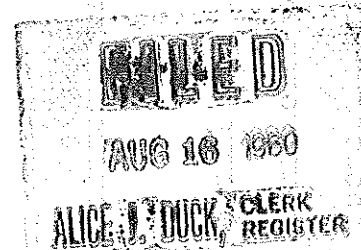
Plaintiff,

VS.

EUGENE HARRISON WOOD, IV, and
MARTIN W. WILLIAMSON, individ-
ually and jointly,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4187



VS. Plaintiff,

EUGENE HARRISON WOOD, IV,
and MARTIN W. WILLIAMSON,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. 4187

Now come the defendants, each separately and severally,
and for answer to the plaintiff's amended complaint say:

J. B. Blackburn
Attorney for Defendants

Filed
9-16-60

ANSWER

CLARA SHEPPARD JONES,

Plaintiff,

VS.

EUGENE HARRISON WOOD, IV, and
MARTIN W. WILLIAMSON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4187

*filed 9-16-60
Chief Clerk*

CLARA SHEPPARD JONES,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	
)	AT LAW NO. 4187
EUGENE HARRISON WOOD, IV, and)	
MARTIN W. WILLIAMSON, individ-)	
ually and jointly,)	
Defendants.)	

AMENDED DEMURRER

Now come the defendants and each of the defendants, separately and severally, and amend the demurrer to the complaint heretofore filed in this cause by them and as grounds of such demurrer assign, separately and severally, the following additional grounds:

9. The allegations of the complaint are conclusions of the pleader and no facts are alleged to show that the plaintiff's alleged injuries were caused by the negligence of the defendants, or either of them.

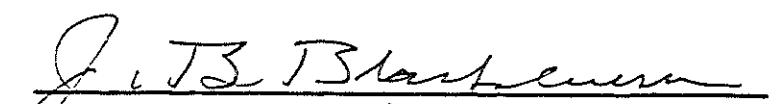
10. The allegations of the complaint are so vague, indefinite and uncertain that it is impossible to determine therefrom how the plaintiff was injured.

11. No facts are alleged to show that the defendants' alleged negligence was the proximate cause of the plaintiff's alleged injuries and damages.

12. The allegations of the complaint are inconsistent and confusing.

13. The allegations of the complaint do not charge actionable negligence on the part of either of the said defendants.

14. The allegations of the complaint, with respect to plaintiff's alleged damages, are so vague, indefinite and uncertain that they do not apprise the defendants of what they will be called upon to defend.


Attorney for defendants

FILED

APR 19 1960

ALICE I. DUCK, CLERK
REGISTER

AMENDED DEMURRER

CLARA SHEPPARD JONES,

Plaintiff,

VS.

EUGENE HARRISON WOOD, IV, and
MARTIN W. WILLIAMSON, individ-
ually and jointly,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4187

CLARA SHEPPARD JONES,)	IN THE CIRCUIT COURT OF
	(
Plaintiff,)	BALDWIN COUNTY, ALABAMA,
	(
VS.)	AT LAW.
	(
EUGENE HARRISON WOOD, IV,)	NO. 4187.
and MARTIN W. WILLIAMSON,	(
individually and jointly,)	
	(
Defendants.)	

AMENDMENT OF COMPLAINT

Now comes the plaintiff in the above styled cause and amends the complaint heretofore filed in this case so that the same shall read as follows:

COUNT ONE

Plaintiff claims of the defendants the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, as damages, for that heretofore and on, to-wit, the 7th day of November, 1959, while the plaintiff was a passenger in an automobile on U. S. Highway 31 on the Tensaw River bridge, said U. S. Highway 31 being then and there a public highway, the defendant, Eugene Harrison Wood, IV, a minor of the age of, to-wit, twenty (20) years, while acting as the agent of and accompanied by the defendant, Martin W. Williamson, within the line and scope of his employment as such agent, negligently operated a motor vehicle on said U.S. Highway 31, at or near the East end of the said Tensaw River bridge, in Baldwin County, Alabama, as to cause the motor vehicle in which the plaintiff was riding to collide with another motor vehicle on said bridge, on said U. S. Highway 31, and as a proximate result thereof, the plaintiff was injured and damaged as follows: her forehead was severely cut or lacerated and over, to-wit, one hundred (100) stitches were taken in her forehead, leaving a large, conspicuous, ugly scar; she has been caused to be permanently disfigured; she lost a considerable amount of blood and it was necessary for her to have blood transfusions; she was caused to suffer severe shock; she was caused to suffer excruciating pain of her face and forehead; the portion over her right eye where the scar is and above her eye to the top of her head was caused to be numb, and she avers that such condition will continue for a

LAW OFFICES

J. Terry Reynolds, Jr.

AND

William R. Lauten

1ST NAT'L BANK BLDG.

MOBILE, ALA.

long time in the future; she was badly bruised on her face and about her body, and both of her eyes were blackened; the socket of her right hip bone, called the acetabulum, was broken; she was caused to be hospitalized and bedridden for a long time; the motion of her hip was limited and she suffered muscle spasm of her thigh and gluteal muscles; she was caused to be put in traction with weights on here feet in her attempts to heal the broken bone properly; when she was able to walk, she was lame, and it was necessary for her to use crutches for a long time; she avers that it is still difficult for her to get about and avers that this condition will exist for a long time in the future; she was caused to suffer extreme physical pain on account of her injury to her hip, and she was caused to suffer extreme mental anguish and worry; she avers that she has suffered permanent injuries on account of the severe cut in her forehead and on account of her injury to her hip; she was caused to be incapacitated and to lose considerable time from her employment, and she avers that she will lose time from her employment in the future; she was caused to incur great expenses for doctors, nurses, hospitalization, x-rays, medicines, drugs and sedatives, and she avers that she will be caused to undergo further medical treatment and will incur further expenses in her attempts to heal and cure her injuries; the plaintiff avers that all of her injuries and damages were caused as a proximate result of the negligence of the defendant, Eugene Harrison Wood, IV, who was then and there the agent of the defendant, Martin W. Williamson, and who was then and there acting within the line and scope of his employment as such agent, in and about the operation of said motor vehicle by the said Eugene Harrison Wood, IV at said time and place.

J. Terry Reynolds, Jr.
William R. Lauten
 Attorneys for plaintiff

Plaintiff respectfully demands a trial by jury in this case.

J. Terry Reynolds, Jr.
William R. Lauten
 Attorneys for plaintiff

LAW OFFICES
 J. Terry Reynolds, Jr.
 AND
 William R. Lauten
 1ST NAT'L BANK BLDG.
 MOBILE, ALA.

FILED
 AUG 16 1960
 ALICE I. DUCK, CLERK
 REGISTER

*Verdict accepted
 8-16-1960
 J. B. Blackburn
 Pcty. for life.*

At the present time
 for the defendant
 James H. ...
 FILED
 AUG 16 1920
 ALICE L. JACK, CLERK
 U.S. DISTRICT COURT

CLARA SHEPPARD JONES,)	
	(
Plaintiff,)	IN THE CIRCUIT COURT OF
	(
VS.)	BALDWIN COUNTY, ALABAMA,
	(
EUGENE HARRISON WOOD, IV,)	AT LAW.
and MARTIN W. WILLIAMSON,	(
individually and jointly,)	NO. 4187.
	(
Defendants.)	

MOTION FOR JUDGMENT BY DEFAULT FOR FAILURE TO ANSWER INTER-
ROGATORIES

Now comes the Plaintiff in the above styled cause and shows unto the Court that, pursuant to the provisions of Title 7, Sections 477 et seq., of the 1940 Code of Alabama, the Plaintiff propounded interrogatories to the Defendant, Martin W. Williamson; that more than sixty (60) days have elapsed since the filing of said interrogatories and since the service of the same upon said Defendant; that said Defendant has failed or refused to answer said interrogatories;

WHEREFORE, the Plaintiff respectfully moves the Court to enter an order directing that a judgment by default be entered against the Defendant, Martin W. Williamson, or render such judgment as would be appropriate if said Defendant offered no evidence; and the Plaintiff asks the Court for such other orders which the Court may deem proper, the premises considered.

FILED
JUL 16 1960
ALICE I. JACK, CLERK
REGISTER

J. Terry Reynolds, Jr.
William R. Faulkner
Attorneys for Plaintiff.

CLARA SHEPPARD JONES,)
Plaintiff,)
VS.)
EUGENE HARRISON WOOD, IV, and)
MARTIN W. WILLIAMSON, individ-)
ually and jointly,)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4187

AMENDED DEMURRER

Now come the defendants, each separately and severally, and further amend the demurrer heretofore filed by them in this cause and as grounds thereof assign, separately and severally, the following:

15. No facts are alleged to show any connection between the defendants' alleged negligence and the plaintiff's alleged damages.

16. The facts alleged do not show any ^{causal} connection between the defendants' alleged negligence and the plaintiff's alleged damages.

17. No facts are alleged to show that the defendants' alleged negligence was the proximate cause of the plaintiff's alleged damages.

J. B. Blackburn
Attorney for Defendants

FILED

JUN 17 1960

ALICE J. DUCK, CLERK
REGISTER

AMENDED DEMURRER

CLARA SHEPPARD JONES,

Plaintiff,

VS.

EUGENE HARRISON WOOD, IV, and
MARTIN W. WILLIAMSON, individ-
ually and jointly,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4187

FILED
JUN 17 1960
ALICE J. BICK, CLERK
REGISTER

CLARA SHEPPARD JONES,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	
)	AT LAW NO. 4187
EUGENE HARRISON WOOD, IV,)	
and MARTIN W. WILLIAMSON,)	
individually and jointly,)	
Defendants.)	

TO CLARA SHEPPARD JONES AND TO J. TERRY REYNOLDS, JR., AND WILLIAM R. LAUTEN, HER ATTORNEYS:

You are hereby notified that the defendants, pursuant to the provisions of Act 375, enacted by the 1955 Legislature of Alabama (Title 7, Section 474(1), 474(18), 1940 Code of Alabama, as amended), desire to and will take the testimony of the plaintiff, Clara Sheppard Jones, in the office of J. Terry Reynolds, Jr., and William R. Lauten, 605 First National Bank Building, Mobile, Alabama, at 3:00 o'clock P. M. on Thursday, May 26, 1960, before Louise Dusenbury, a Notary Public, State of Alabama at Large, and Court Reporter of the 28th Judicial Circuit of Alabama.

You are hereby further notified to be present at the time and place aforesaid.

Dated this 28th day of April, 1960.

J. B. Blackburn
 Attorney for defendants

STATE OF ALABAMA)
 *
 BALDWIN COUNTY)

I hereby certify that I mailed a copy of the above and foregoing notice to J. Terry Reynolds, Jr., and William R. Lauten, attorneys for the plaintiff, by first class mail, postage prepaid, properly addressed to them at 605 First National Bank Building, Mobile, Alabama, on this the 28th day of April, 1960.

J. B. Blackburn
 Attorney for defendants

FILED
 APR 29 1960
 ALICE J. DUCK, Clerk.

cu

NOTICE

CLARA SHEPPARD JONES,
Plaintiff,

vs.

EUGENE HARRISON WOOD, IV, and
MARTIN W. WILLIAMSON, individ-
ually and jointly,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. 4187.

FILED

APR 29 1960

ALICE J. DUCK, Clerk

CLARA SHEPPARD JONES,	(IN THE CIRCUIT COURT OF
)	
Plaintiff,	(BALDWIN COUNTY, ALABAMA,
)	
VS.	(AT LAW.
)	
EUGENE HARRISON WOOD, IV,	(NO. 4187
et al.,)	
	(
Defendants.)	

M O T I O N

Now comes the Plaintiff in the above styled cause and respectfully shows unto the Court that the Plaintiff is informed and believes, and upon such information and belief states the following:

1. One of the Defendants in this case, Eugene Harrison Wood, IV, is a minor of the age of twenty (20) years.
2. Service of a copy of the summons and complaint was had on the Defendant, Eugene Harrison Wood, IV, on February 24, 1960, and service of a copy of the summons and complaint was also had upon his father, Eugene Harrison Wood, III, on February 24, 1960, and more than thirty (30) days have expired after perfection of service upon said defendant.
3. The Defendant, Eugene Harrison Wood, IV, has not nominated a guardian ad litem to represent him in this case as provided by Section 181, Title 7, Code of Alabama, 1940.

WHEREFORE, Plaintiff respectfully moves the Court to appoint a guardian ad litem to represent the said Defendant, Eugene Harrison Wood, IV, in this case in accordance with Sections 177 and 181, Title 7, Code of Alabama, 1940.

FILED

APR 11 1960

ALICE J. DUCK, CLERK
REGISTER

J. Terry Reynolds, Jr.
William R. Lauten

Attorneys for Plaintiff

Please serve a copy of the above and foregoing motion on Honorable J. B. Blackburn, attorney of record for the defendants.

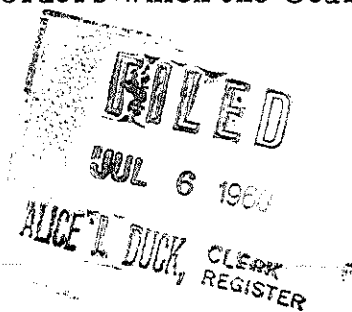
LAW OFFICES
J. Terry Reynolds, Jr.
AND
William R. Lauten
1ST NAT'L BANK BLDG.
MOBILE, ALA.

CLARA SHEPPARD JONES,)	
	(
Plaintiff,)	IN THE CIRCUIT COURT OF
	(
VS.)	BALDWIN COUNTY, ALABAMA,
	(
EUGENE HARRISON WOOD, IV,)	AT LAW.
and MARTIN W. WILLIAMSON,	(
individually and jointly,)	NO. 4187.
	(
Defendants.)	

MOTION FOR JUDGMENT BY DEFAULT FOR FAILURE TO ANSWER INTER-
ROGATORIES

Now comes the Plaintiff in the above styled cause and shows unto the Court that, pursuant to the provisions of Title 7, Sections 477 et seq., of the 1940 Code of Alabama, the Plaintiff propounded interrogatories to the Defendant, Eugene, Harrison Wood, IV; that more than sixty (60) days have elapsed since the filing of said interrogatories and since the service of the same upon said Defendant; that said Defendant has failed or refused to answer said interrogatories;

WHEREFORE, the Plaintiff respectfully moves the Court to enter an order directing that a judgment by default be entered against the Defendant, Eugene Harrison Wood, IV, or render such judgment as would be appropriate if said Defendant offered no evidence; and the Plaintiff asks the Court for such other orders which the Court may deem proper, the premises considered.



J. Terry Reynolds, Jr.
William R. Lanier
Attorneys for Plaintiff.

CLARA SHEPPARD JONES,

Plaintiff,

VS.

EUGENE HARRISON WOOD, IV,
and MARTIN W. WILLIAMSON,
Individually and Jointly,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

NO. 4187

COUNT ONE

Plaintiff claims of the Defendants the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, as damages, for that heretofore and on, to-wit, the 7th day of November, 1959, the Defendant, Eugene Harrison Wood, IV, a minor of the age of, to-wit, twenty (20) years, while acting as the agent of and accompanied by the Defendant, Martin W. Williamson, within the line and scope of his employment as such agent, so negligently operated a motor vehicle, to-wit, a 1959 Chevrolet Corvette Sportscar, owned by said Martin W. Williamson, in a westwardly direction on U. S. Highway 31, at or near the east end of the Tensaw River bridge, said highway being then and there a public highway in Baldwin County, Alabama, as to cause said sportscar to run into or collide with a motor vehicle, to-wit, a 1956 Lincoln Coach, being then and there operated by Malcolm E. Chandler in an eastwardly direction on said U. S. Highway 31, and as to cause said sportscar also to run into, collide with or strike against another motor vehicle, to-wit, a 1955 Ford Sedan, being then and there operated by Cynthia H. Huschka in a westwardly direction on said U. S. Highway 31, and as to cause the eastbound motor vehicle traffic on said bridge to be suddenly blocked, causing another motor vehicle, to-wit, a 1958 Oldsmobile Sedan, traveling in an eastwardly direction on said U. S. Highway 31 on said bridge, and in which the Plaintiff was riding as a passenger, to collide with or run into another motor vehicle, to-wit, a 1958 Plymouth, being operated by John T. Hadley in an eastwardly direction on said U. S. Highway 31 on said bridge, and as a proximate result of the negligence, as aforesaid, of the Defendant, Eugene Harrison Wood, IV, while accompanied by and while acting as the agent of the

Defendant, Martin W. Williamson, within the line and scope of his employment as such agent, the Plaintiff was injured and damaged as follows, to-wit: her forehead was severely cut or lacerated and over, to-wit, one hundred (100) stitches were taken in her forehead, leaving a large, conspicuous, ugly scar; she has been caused to be permanently disfigured; she lost a considerable amount of blood and it was necessary for her to have blood transfusions; she was caused to suffer severe shock; she was caused to suffer excruciating pain of her face and forehead; the portion over her right eye where the scar is and above her eye to the top of her head was caused to be numb, and she avers that such condition will continue for a long time in the future; she was badly bruised on her face and about her body, and both of her eyes were blackened; the socket of her right hip bone, called the acetabulum, was broken; she was caused to be hospitalized and bedridden for a long time; the motion of her hip was limited and she suffered muscle spasm of her thigh and gluteal muscles; she was caused to be put in traction with weights on her feet in her attempts to heal the broken bone properly; when she was able to walk, she was lame, and it was necessary for her to use crutches for a long time; she avers that it is still difficult for her to get about and avers that this condition will exist for a long time in the future; she was caused to suffer extreme physical pain on account of her injury to her hip, and she was caused to suffer extreme mental anguish and worry; she avers that she has suffered permanent injuries on account of the severe cut in her forehead and on account of her injury to her hip; she was caused to be incapacitated and to lose considerable time from her employment, and she avers that she will lose time from her employment in the future; she was caused to incur great expenses for doctors, nurses, hospitalization, x-rays, medicines, drugs and sedatives, and she avers that she will be caused to undergo further medical treatment and will incur further expenses in her attempts to heal and cure her injuries, all to her great damage.

The Plaintiff demands a trial by jury.

J. Terry Reynolds, Jr.
William R. Lauten
Attorneys for Plaintiff.

NOTE TO SHERIFF:

Please serve the Defendant, Eugene Harrison Wood, IV, by personal service of a copy of the complaint on him at 417 Battery Avenue, Selma, Alabama, and please also serve a copy of the complaint on his father, Eugene Harrison Wood, III, 417 Battery Avenue, Selma, Alabama.

The Defendant, Martin W. Williamson, may be served by service of a copy of the complaint on him at Bay Minette, Alabama.

(Serve one copy of the summons and complaint on Eugene Harrison Wood, IV, one copy on his father, Eugene Harrison Wood, III, and one copy of summons and complaint on Martin W. Williamson.)

FILED

FEB 18 1960

ALICE J. DUCK, Clerk

Executed this the 24 day of Feb, 1960,
by leaving a copy of the within summons and complaint with

Engine Harrison Wood IV

Defendant.

James H. Clark Jr.
Sheriff of Dallas County, Ala.

By V.B. Bates
Deputy Sheriff, Dallas County, Ala.

Executed this the 24 day of Feb, 1960,
by leaving a copy of the within summons and complaint with

Engine Harrison III

Defendant.

James H. Clark Jr.
Sheriff of Dallas County, Ala.

By V.B. Bates
Deputy Sheriff, Dallas County, Ala.

EXECUTED

This the 24 day of Feb, 1960

James H. Clark Jr.
James G. Clark, Jr., Sheriff

V.B. Bates
Deputy Sheriff

Mileage 20

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4187

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EUGENE HARRISON WOOD, IV, and

MARTIN W. WILLIAMSON, Individually and Jointly

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 EUGENE HARRISON

WOOD, IV, and MARTIN W. WILLIAMSON, Individually and Jointly, Defendant.

by CLARA SHEPPARD JONES

, Plaintiff.

Witness my hand this 18 day of February 1960.

Alice J. Clark, Clerk

No. 4187 Page

The State of Alabama

Baldwin County

CIRCUIT COURT

CLARA SHEPPARD JONES

Plaintiffs

vs.

EUGENE HARRISON, WOOD, IV. and

MARTIN W. WILLIAMSON, Ind. & Jointly
Defendants

Summons and Complaint

Filed February 18, 1960

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

, Sheriff

I have executed this summons

this Feb 18 1960

by leaving a copy with

Martin W. Williamson

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4187

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EUGENE HARRISON, IV. et al

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

EUGENE HARRISON, IV., et al, Defendant

by CLARA SHEPPARD JONES

Plaintiff

Witness my hand this 16th day of March 1960

Alice J. Duck, Clerk

to be served on
Hon. J. B. Blackburn

No. 4187 Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

CLARA SHEPPARD JONES

Plaintiffs

vs.

EUGENE HARRISON WOOD, IV., et al

Defendants

Summons and Complaint

Filed March 16, 1960

Alice J. Duck Clerk

March 18, 1960
not found in Dallas County
after diligent search &
inquiry
J. S. Clark Jr.
M. W. Holley

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office
RECEIVED IN OFFICE

MAR 17 1960

Sheriff

I have executed this summons

this April 5 1960
by leaving a copy with

J. B. Blackburn

Taylor Williams Sheriff

D. A. Tolbert Deputy Sheriff

D. M. M.

DEMURRER

CLARA SHEPPARD JONES,

Plaintiff,

VS.

EUGENE HARRISON WOOD, IV, and
MARTIN W. WILLIAMSON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4187

FILED

MAR 18 1960

ALICE J. DUCK, CLERK

CLARA SHEPPARD JONES,)	IN THE CIRCUIT COURT OF
	(
Plaintiff,)	BALDWIN COUNTY, ALABAMA,
	(
VS.)	AT LAW.
	(
EUGENE HARRISON WOOD, IV,)	NO. 4187
and MARTIN W. WILLIAMSON,	(
individually and jointly,)	
	(
Defendants.)	

INTERROGATORIES TO THE DEFENDANT, EUGENE HARRISON WOOD, IV.

Now comes the Plaintiff in the above styled cause and, pursuant to the provisions of Title 7, Section 477, et seq., of the 1940 Code of Alabama, propounds the following interrogatories to the Defendant, Eugene Harrison Wood, IV, to be answered by him under oath and as provided by law:

1. (a) State your correct name, age, residence address and business address.
- (b) Is your name correctly stated in the complaint on file in this cause?
- (c) If you state that your name is not correctly stated, then state the correct way that you could be designated as a party plaintiff or a party defendant in an action by law;
 - (1) At the time that the accident which is made the basis of this suit occurred;
 - (2) At the time that you answer these interrogatories.
2. (a) Describe completely and in detail the vehicle occupied by you on the occasion of the accident made the basis of this suit, stating in your answer the make, model, year, and body style of same.
- (b) State the name and address of the driver of said motor vehicle on the date of said accident.
- (c) State the name and address of the owner of said motor vehicle on the date of said accident.
- (d) Describe completely and in detail every item of damage sustained by said vehicle.
- (e) Give the amount of each repair estimate obtained on said damage and give the name and address of the person making said repair estimate.
- (f) 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 who made said repairs.

CLARA SHEPPARD JONES,)	
)	IN THE CIRCUIT COURT OF
VS. Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
EUGENE HARRISON WOOD, IV,)	AT LAW NO. 4187
and MARTIN W. WILLIAMSON,)	
Individually and Jointly,)	
Defendants.)	

DEMURRER

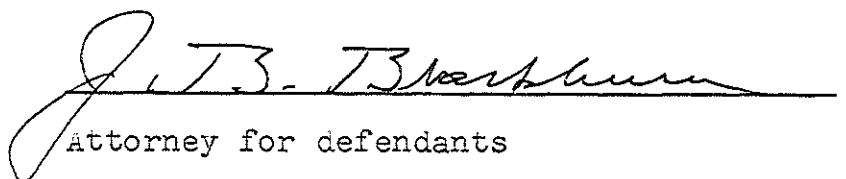
Now come the defendants and each of the defendants, separately and severally, and demur to the complaint in this cause and as grounds of such demurrer assign, separately and severally, the following:

1. It does not state a cause of action.
2. No facts are alleged on which the relief sought can be granted.
3. The allegations of the complaint are conclusions of the pleader.
4. The allegations of the complaint are vague, indefinite and uncertain.
5. No facts are alleged to show where the plaintiff was injured.
6. The allegations of the complaint are vague, indefinite and uncertain and no facts are alleged to show where the car was located in which the plaintiff was riding at the time of her alleged injury.
7. The allegations of the complaint are conclusions of the pleader and no facts are alleged to show that the alleged negligence, as set out in the complaint, was the proximate cause of the plaintiff's alleged injuries.
8. The location of the accident in which the plaintiff was injured is not described with sufficient certainty.

FILED

MAR 18 1960

ALICE I. DUCK, Clerk


Attorney for defendants

DEMURRER

CLARA SHEPPARD JONES,

Plaintiff,

VS.

EUGENE HARRISON WOOD, IV, and
MARTIN W. WILLIAMSON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4187

FILED
MAR 18 1960

ALICE J. DUCK, Clerk

- (g) Describe the condition of the brakes, signal device, steering apparatus, tires, and lighting equipment on said motor vehicle at the time of the accident made the basis of this suit.
 - (h) When had the brakes, signal device, steering apparatus, lights and tires on said motor vehicle last been inspected prior to said accident and by whom?
- 3.
- (a) If you have stated that the owner of the vehicle occupied by you at the time of the accident made the basis of this suit was not the driver on the occasion of said accident, explain fully and in detail the presence of the driver in said vehicle.
 - (b) State who was the employer of the driver of the vehicle occupied by you at the time said accident occurred.
 - (c) State on whose business or behalf said driver was acting at the time that said accident occurred.
- 4.
- (a) State the number of persons occupying the motor vehicle in which you were riding on the occasion of and at the time of said accident, and state specifically how and in what manner each of said occupants were located in said vehicle on said occasion.
 - (b) State the name and address of each person occupying the motor vehicle in which you were riding on the occasion of said accident and at the time of said accident.
 - (c) State fully the purpose of the trip you were making at the time of the accident made the basis of this suit.
 - (d) From what point had you departed?
 - (e) What was your destination?
 - (f) Were you performing a mission, errand, or duty for anybody whatsoever? If so, state the nature of same and the name and address of the person for whom you were performing it.
 - (g) Give the name and address of each and every person or firm who had any interest whatsoever in the trip that was being made by the driver of the vehicle in which you were riding on the occasion of and at the time of said accident made the basis of this suit, and state the nature of said interest and the connection of said person or firm with the trip.
5. Prepare and attach to your answers to these interrogatories a map portraying the scene of the accident and the physical objects involved in the accident made the basis of this suit and designate on said map the following:
- (a) The point of impact and skid marks leading up to and from same;
all
 - (b) The resting place of/the vehicles involved in the accident in any way after the accident occurred.
 - (c) The placement of any other vehicles or physical objects which had anything to do with said accident.

6. (a) Describe the locus of the accident with reference to the contour of the land, the grade or curve of the road or highway, and any physical structures located within 200 yards of the place of the accident and where the vehicle in which you were riding came to rest immediately after the accident.
- (b) Describe any traffic controls, signals or traffic signs located within 200 yards of the scene of the accident and within 200 yards of where the vehicle occupied by you came to rest immediately after the accident, and the operation of such controls, signals or traffic signs, stating the directions in which said traffic controls, signals or traffic signs faced, and where such controls, signals or traffic signs were located.
7. (a) State where the motor vehicle in which Mr. Malcolm Chandler was riding was located with reference to the point of the impact of Mr. Chandler's automobile with the automobile occupied by you when you first observed Mr. Chandler's vehicle immediately prior to said accident.
- (b) Did you see the motor vehicle in which Mr. Malcolm Chandler was riding before the actual collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler?
- (c) How many feet was the motor vehicle in which Mr. Malcolm Chandler was riding from the place of said collision when you first observed same.
- (d) How many feet were you from the point of said impact when you first observed the vehicle in which Mr. Malcolm Chandler was riding?
- (e) Where did said impact occur with reference to the center line of the street or highway on which the vehicle in which Mr. Malcolm Chandler was traveling?
- (f) Where did said impact occur with reference to the right edge of the street or highway on which the vehicle driven or occupied by you was traveling?
8. (a) State where the motor vehicle in which Mrs. Cynthia Huschka was riding was located with reference to the point of the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Huschka when you first observed said motor vehicle occupied by Mrs. Huschka immediately prior to said accident.
- (b) Did you see the motor vehicle in which Mrs. Cynthia Huschka was riding before the actual collision of the vehicle occupied by you with the vehicle occupied by Mrs. Huschka?
- (c) How many feet was the motor vehicle in which Mrs. Cynthia Huschka was riding from the place of said impact when you first observed same?
- (d) How many feet were you from the point of said impact when you first observed the vehicle in which Mrs. Cynthia Huschka was riding?
- (e) Where did said impact with the automobile in which Mrs. Cynthia Huschka was riding occur with reference to the center line of the street or highway on which the vehicle occupied by Mrs. Cynthia Huschka was traveling?

- (f) Where did the impact with the automobile operated by Mrs. Cynthia Huschka occur with reference to the right edge of the street or highway on which the vehicle occupied by you was traveling.
9. (a) State where the motor vehicle in which the plaintiff was riding was located with reference to the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler when you first observed the automobile in which the plaintiff was riding immediately prior to the accident.
- (b) Did you see the motor vehicle in which the plaintiff was riding before the actual collision with the automobile occupied by Mr. Malcolm Chandler?
- (c) Did you see the motor vehicle in which the plaintiff was riding before the actual impact of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka?
- (d) How many feet was the motor vehicle in which the plaintiff was riding from the place of the impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler when you first observed the motor vehicle in which the plaintiff was riding?
- (e) How many feet was the motor vehicle in which the plaintiff was riding from the place of the impact of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka when you first observed the motor vehicle in which the plaintiff was riding?
- (f) How many feet were you from the point of impact with the automobile occupied by Mr. Malcolm Chandler when you first observed the vehicle in which the plaintiff was riding?
- (g) How many feet were you from the point of impact of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka when you first observed the automobile in which the plaintiff was riding?
10. (a) 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 same as seen by you.
- (b) Describe each and everything which the driver of the vehicle occupied by Mr. Malcolm Chandler failed to do to avoid said accident.
- (c) Describe each and everything which the driver of the vehicle occupied by Mrs. Cynthia Huschka failed to do to avoid said accident.
- (d) Describe each and everything which the driver of the vehicle occupied by Mr. John T. Hadley failed to do to avoid said accident.
- (e) Described each and everything which the driver of the vehicle occupied by the plaintiff failed to do to avoid said accident.

LAW OFFICES

J. Terry Reynolds, Jr.

AND

William R. Lauten

1ST NAT'L BANK BLDG.

MOBILE, ALA.

- (f) Describe each and everything done by the driver of the vehicle occupied by Mr. Malcolm Chandler which contributed to ^{the} cause of said accident.
 - (g) Describe each and everything done by the driver of the vehicle occupied by Mrs. Cynthia Huschka which contributed to the cause of said accident.
 - (h) Describe each and everything done by the driver of the vehicle occupied by Mr. John T. Hadley which contributed to the cause of said accident.
 - (i) State each and everything done by you or which you omitted to do, which contributed proximately to the cause of the accident.
 - (j) Describe each negligent act or omission of the driver of the vehicle occupied by Mr. Malcolm Chandler on said occasion.
 - (k) Describe each negligent act or omission of the driver of the vehicle occupied by Mrs. Cynthia Huschka on said occasion.
 - (l) Describe each negligent act or omission of the driver of the vehicle occupied by Mr. John T. Hadley on said occasion.
 - (m) Describe each negligent act or omission of the driver of the vehicle in which the plaintiff was riding on said occasion.
- 11.
- (a) Describe each and everything which the driver of any other vehicle involved in the accident failed to do to avoid said accident.
 - (b) State specifically where each of the automobiles driven by any of such persons was located at the time of the initial impact of your automobile with that of Mr. Malcolm Chandler.
 - (c) State the name and address of each such driver which you say failed to do anything to avoid said accident.
 - (d) Describe each and everything done by any other driver of any other vehicle involved in the accident which contributed to the cause of said accident.
 - (e) Describe each negligent act or omission of the driver of any other vehicle involved in the accident which contributed to or caused the accident.
- 12.
- (a) State whether any of the occupants (including yourself) in any of the vehicles involved in the accident made the basis of this suit were intoxicated or were under the influence of intoxicating beverages to any degree at the time of the accident.
 - (b) Please state the name and address of each of said persons who was intoxicated or was under the influence of any intoxicating beverages at said time.
 - (c) State what you had been drinking, in the way of intoxicating beverages prior to the accident, where you had obtained the same, the quantity or amount consumed, and the time and place where same was drunk.

LAW OFFICES

J. Terry Reynolds, Jr.

AND

William R. Lauten

1ST NAT'L BANK BLDG.

MOBILE, ALA.

- (d) State what Mr. Martin W. Williamson had been drinking in the way of intoxicating beverages prior to the accident, where he had obtained the same, the quantity or amount consumed by him, and the time and place where the same was drunk.
 - (e) State whether the automobile occupied by you had been stopped by the Alabama Highway Patrol shortly prior to the accident, and, if so, please state where the automobile occupied by you was located at such time, and the name and address of the driver of the automobile occupied by you at the time it was stopped by the Highway Patrol.
 - (f) Please state what was said by any of the occupants of the automobile in which you were riding at the time of the accident in the presence of the Highway Patrol officer immediately after the automobile occupied by you was stopped by the Highway Patrol just before the accident and what was said by the Highway Patrol officer in your presence.
 - (g) State fully what each of the occupants of the automobile occupied by you was doing at the time it was stopped by the Highway Patrol just prior to the accident.
13. State, according to your best judgment, the speed of the vehicle occupied by Mrs. Cynthia Huschka 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 of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (c) At a point 200 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (d) At a point 100 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (e) At a point 50 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (f) At a point 25 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (g) At a point 10 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
 - (h) At the time of the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka;
 - (i) Immediately after the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka.

14. State, according to your best judgment, the speed of the vehicle occupied by Mr. Malcolm Chandler 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 of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (c) At a point 200 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (d) At a point 100 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (e) At a point 50 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (f) At a point 25 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (g) At a point 10 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (h) At the time of the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler;
 - (i) Immediately after the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler.
15. (a) State in what direction and along what highway each of the motor vehicles involved in the accident made the basis of this suit was traveling on the occasion of said accident.
- (b) State in your best judgment, in number of feet, the width of such highway, at the following points:
- (1) 300 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (2) 200 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (3) 100 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (4) 50 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (5) 25 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (6) 10 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;

- (7) At the time of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
 - (8) Immediately after the impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
 - (9) 200 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (10) 100 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (11) 50 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (12) 25 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (13) 10 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
 - (c) If any of the vehicles involved in the accident made the basis of this suit was engaged in making a turn from the direct line of travel (including passing another vehicle), describe same, and the course followed with reference to the center line or what would be the center of the traveled portion of the highway on which such vehicle was traveling prior to such turn or prior to such passing.
16. (a) State fully, specifically and in detail each and every act or thing done by the driver of the automobile occupied by you at the time of the accident made the basis of this suit during the last 200 feet of the approach of the vehicle occupied by you to the point of collision with the automobile occupied by Mr. Malcolm Chandler, stating in your answer the chronological order in which the driver of said vehicle occupied by you did each of said acts or things.
- (b) Describe each change in the course of travel made by the vehicle occupied by Mr. Malcolm Chandler immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Chandler.
- (c) Describe each change in the course of travel made by the vehicle occupied by Mrs. Cynthis Huschka immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mrs. Huschka.
- (d) Describe each change in the course of travel made by the vehicle occupied by Mrs. Cynthia Huschka immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (e) Describe each change in the course of travel made by the vehicle occupied by you immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.

- travel
- (f) Describe each change in the course of/made by the vehicle occupied by you immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.
17. (a) State whether or not the brakes on the vehicle occupied by you at the time of the accident sued on were applied prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (b) If so, state in your best judgment the speed in miles per hour the vehicle occupied by you was traveling at the moment the brakes were applied.
- (c) State in your best judgment the distance in number of feet the vehicle occupied by you traveled from the moment the brakes were applied until the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler occurred.
- (d) State in your best judgment the distance in number of feet the vehicle occupied by you traveled from the moment the brakes were applied until it came to a stop after the occurrence of the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
18. (a) State specifically what portion of the vehicle occupied by you first came in contact with the vehicle occupied by Mr. Malcolm Chandler.
- (b) State specifically what portion of the vehicle occupied by Mr. Malcolm Chandler first came in contact with the vehicle occupied by you.
- (c) State specifically what portion of the vehicle occupied by you first came in contact with the vehicle occupied by Mrs. Cynthia Huschka.
- (d) State specifically what portion of the vehicle occupied by Mrs. Cynthia Huschka first came in contact with the vehicle occupied by you.
- (e) After the initial impact involving the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler, describe what portion of the automobile occupied by you next came in contact with the automobile occupied by Mr. Malcolm Chandler.
- (f) After the initial impact involving the vehicle occupied by Mr. Malcolm Chandler with the vehicle occupied by you, describe what portion of the automobile occupied by Mr. Malcolm Chandler next came in contact with the automobile occupied by you.
- (g) After the initial impact involving the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka, describe what portion of the automobile occupied by you next came in contact with the automobile occupied by Mrs. Cynthia Huschka.
- (h) After the initial impact involving the vehicle occupied by Mrs. Cynthia Huschka with the vehicle occupied by you, describe what portion of the automobile occupied by Mrs. Cynthia Huschka next came in contact with the automobile occupied by you.

19. (a) 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.
- (b) In what direction did each of said motor vehicles move from the point of said collision until they came to a complete stop?
- (c) Describe each and every skid mark which led up to the point of collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (d) Describe each and every skid mark which led up to the point of collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.
- (e) Describe each and every skid mark which extended from the point of collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler toward the place where either of such motor vehicles came to rest.
- (f) Describe each and every skid mark which extended from the point of collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka toward the place where either of such motor vehicles came to rest.
- (g) Locate the point where each motor vehicle came to rest with reference to the point of impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler, the center of the highway, the end of the bridge, and the right edge of the highway on which each of such motor vehicles had been traveling.
- (h) Locate the point where each motor vehicle came to rest with reference to the point of impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka, the center of the highway, the end of the bridge, and the right edge of the highway on which each of such motor vehicles had been traveling.
20. State the speed of the motor vehicle occupied by you, according to your best judgment, at the following points:
- (a) When you were within a distance of 300 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (b) When you were within a distance of 200 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (c) When you were within a distance of 100 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (d) When you were within a distance of 50 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (e) When you were within a distance of 25 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.

21. (a) State whether any horn or 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.
- (b) If so, describe each of said signals given by each respective driver specifically and in detail.
- (c) State how far distant from the point of collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler each vehicle was located at the time said signal was given.
- (d) State how far distant from the point of collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka each vehicle was located from the time said signal was given.
- (e) If any signals for stopping or turning were given by the driver of any of the vehicles involved in the accident immediately prior to the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler, describe same, and state how far distant from the point of such impact each said signal was given by each driver respectively.
- (f) If any signals for stopping or turning were given by either driver immediately prior to the collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka, describe same, and state how far distant from the point of such impact each said signal was given by each driver respectively.
22. (a) 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.
- (b) If so, state the number of such other vehicles and where they were located with reference to the point of the accident at the east end of the Tensaw River bridge at the moment the same occurred.
- (c) 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 of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
- (d) 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 of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka.
- (e) Please state fully and in detail in what manner any such other vehicles located at or near the scene of the accident played any part or contributed in any manner, to cause the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
- (f) Please state fully and in detail in what manner any such other vehicles located at or near the scene of the accident played any part or contributed in any manner, to cause the collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka.

- (g) Give the name and address of each driver or owner of each of such other vehicles which contributed in any manner to cause the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (h) Give the name and address of each driver or owner of each of such other vehicles which contributed in any manner to cause the collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.
23. (a) State whether or not any vehicle other than the one occupied by you played any part, or contributed in any manner, to cause the collision of the automobile occupied by the plaintiff with that occupied by Mr. John T. Hadley.
- (b) If your answer to 23(a) is in the affirmative, please state the name and address of the driver or owner of such vehicle, and describe fully how and in what manner each of such other vehicles contributed in any manner to cause the collision of the automobile occupied by the plaintiff with that occupied by John T. Hadley, and state where each of such vehicles were located at such time and the direction each such vehicle was traveling.
24. (a) Did you make any statements to the Highway Patrol officer investigating the accident following the occurrence of the collisions of the automobile occupied by you with those occupied by Mr. Malcolm Chandler and Mrs. Cynthia Huschka?
- (b) If so, state when, where and what was said by you.
- (c) Did the Highway Patrol officer investigating the accident involving the collision of the automobile occupied by you with those occupied by Mr. Malcolm Chandler and Mrs. Cynthia Huschka make any statement in your presence following the occurrence of such collision?
- (d) If so, state when, where and what was said by said Highway Patrol officer in your presence.
- (e) Did you make any statements 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?
- (f) If so, state when, where and what was said by you.
- (g) Did the plaintiff make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the plaintiff.
- (h) Did the driver of the automobile in which the plaintiff was riding make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of the vehicle in which the plaintiff was riding?
- (i) Did the driver of the vehicle occupied by Mr. Malcolm Chandler make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of such vehicle?

- (j) Did the driver of the vehicle occupied by Mrs. Cynthia Huschka make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of such vehicle?
 - (k) Did Mr. Martin W. Williamson make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by Martin W. Williamson?
 - (l) Did any other occupant of the automobile occupied by you make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by such other person, and who such other person was?
 - (m) Did the occupant of any vehicle involved in the accident in any manner make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by such other person, and who such other person was and in what vehicle such other person was riding at the time of the accident?
 - (n) Give the name and address of each and every person who was present at each time any such statements were made either by you, or by the driver of the vehicle in which the plaintiff was riding or by the driver of any other of the vehicles or by any of the occupants of any of the vehicles in any manner involved in the accident, following the occurrence of said accident.
 - (o) Give the name and address of each and every person who was present when the accident made the basis of this suit occurred.
 - (p) Give the name and address of each and every person who was present at the time of the collision of the automobile in which the plaintiff was riding with the automobile occupied by Mr. John T. Hadley.
- 25.
- (a) Who gave you permission to use the automobile you were driving on the occasion when you had the accident made the basis of this suit?
 - (b) Please state how many times you had driven an automobile or had ridden in an automobile prior to the accident on U. S. Highway 31 from a point 300 feet east of where the accident occurred to the point of the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
 - (c) Please state how many times and when such times occurred when you had driven over such portion of said highway.
 - (d) Please state whether you were familiar with the portion of the highway 300 feet east from the point of the impact to the place where the collision occurred involving the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
 - (e) Please state whether or not you were familiar with the portion of U. S. Highway 31, 300 feet east of the Tensaw River bridge to the east end of said bridge.
 - (f) If so, how many times had you driven an automobile over such portion of said highway.

26. (a) Please state the purpose of your trip being made by the occupants of the vehicle occupied by you at the time the accident made the basis of this suit occurred.
- (b) Were the occupants of the vehicle in which you were riding all on their way to the football game at Ladd Memorial Stadium between Alabama and Tulane?
- (c) If your answer to the foregoing is in the negative, please state where each of the occupants of the vehicle occupied by you were going at the time said accident occurred.
- (d) Were you a friend of or acquainted with Martin W. Williamson at the time of the accident?
- (e) If your answer to the foregoing is in the affirmative, please state how long you had known Martin W. Williamson and where you had known him prior to the accident.
- (f) Please state whether Martin W. Williamson gave you permission or authorized you to operate the automobile occupied by you at the time of the accident made the basis of this suit.
- (g) If your answer to the foregoing is in the affirmative, please state when and where you were so authorized, and when and where you started driving the automobile prior to the accident made the basis of this suit.
- (h) Please state whether Martin W. Williamson was driving the automobile at any time between Bay Minette, Alabama, and Mobile, Alabama, prior to the collision made the basis of this suit.
- (i) If your answer to the foregoing is in the affirmative, please state when and where and along what route Martin W. Williamson drove said automobile between Bay Minette and Mobile prior to said collision.
- (j) Did you see the automobile occupied by Mrs. Cynthia Huschka at any time while the vehicle occupied by you was between Bay Minette and the place where the collision occurred prior to the collision?
- (k) If your answer to the foregoing question is in the affirmative, please state when and where you saw the automobile occupied by Mrs. Cynthia Huschka prior to the accident, and where it was located each time you saw it with reference to the automobile occupied by you.
- (l) What time did you leave Bay Minette prior to the time the accident occurred?
- (m) Did the vehicle occupied by you make any stops on your way to Mobile from Bay Minette prior to the time of the accident?
- (n) If your answer to the foregoing is in the affirmative, please state when and where such stops were made and state the purpose of each such stops.
- (o) Please state whether the automobile occupied by you at the

time of its collision with the automobile occupied by Mr. Malcolm Chandler was stopped on the day of the accident by an Alabama Highway Patrol officer prior to the time the accident occurred and, if so, please state what was said and done by the Highway Patrol officer in your presence at each such time, what was said and done by you, by Martin W. Williamson and by Dawson Blalock, in your presence and ^{on} each occasion, when and where each such stop occurred, and the name of such Highway Patrol officer, and what you, Martin Williamson and Dawson Blalock were each doing immediately prior to each such stop.

J. Terry Reynolds, Jr.
William R. Lauten
Attorneys for Plaintiff

STATE OF ALABAMA)
COUNTY OF MOBILE)

Before me, the undersigned authority in and for said County in said State, personally appeared William R. Lauten, who, having been by me first duly sworn, deposes and says that he is one of the attorneys for the Plaintiff in the above styled cause, and that, if the foregoing interrogatories are truthfully answered, the answers will be material evidence for the Plaintiff on a trial of this case.

William R. Lauten
Affiant

Sworn to and subscribed before me on this
11th day of March, 1960.

Miriam G. Hill
Notary Public, Mobile County, Alabama.

NOTE TO SHERIFF:

Please serve the defendant, Eugene Harrison Wood, IV, with a copy of these interrogatories, by personal service of a copy of such interrogatories on him at 417 Battery Avenue, Selma, Alabama, and please also serve a copy of such interrogatories on his father, Eugene Harrison Wood, III, 417 Battery Avenue, Selma, Alabama.

4187

Clara Sheppard Jones

VS.

Eugene Harrison Wood
et al.

FILED
MAR 16 1961
ALICE L. DICK
CLERK
REGISTER

4187

CLARA SHEPPARD JONES,	(IN THE CIRCUIT COURT OF
)	
Plaintiff,	(BALDWIN COUNTY, ALABAMA,
)	
VS.	(AT LAW.
)	
EUGENE HARRISON WOOD, IV,	(NO. 4187
and MARTIN W. WILLIAMSON,)	
individually and jointly,	(
)	
Defendants.)	

INTERROGATORIES TO THE DEFENDANT, MARTIN W. WILLIAMSON

Now comes the Plaintiff in the above styled cause and, pursuant to the provisions of Title 7, Section 477, et seq., of the 1940 Code of Alabama, propounds the following interrogatories to the Defendant, Martin W. Williamson, to be answered by him under oath and as provided by law:

1. (a) State your correct name, age, and your present address and business address.
- (b) Give your residence address on November 7, 1959.
- (c) Give your residence address at the time the suit in this case was filed.
- (d) Please state for what period of time prior to the time that this suit was filed you had been a resident of Baldwin County, Alabama, on November 7, 1959.
- (e) Please state whether you were a resident of Baldwin County, Alabama, at the time that the suit in this case was filed.
- (f) Is your name correctly stated in the complaint on file in this cause?
- (g) If you state that your name is not correctly stated, then state the correct way that you could be designated as a party plaintiff or a party defendant in an action by law;
 - (1) At the time that the accident which is made the basis of this suit occurred;
 - (2) At the time that you answered these interrogatories.
2. (a) Describe completely and in detail the vehicle occupied by you on the occasion of the accident made the basis of this suit, stating in your answer the make, model, year, and body style of same.
- (b) State the name and address of the driver of said motor vehicle on the date of said accident.
- (c) State the name and address of the owner of said motor vehicle on the date of said accident.
- (d) Describe completely and in detail every item of damage sustained by said vehicle.
- (e) Give the amount of each repair estimate obtained on said damage and give the name and address of the person making said repair estimate.
- (f) 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 who made said repairs.

- (g) Describe the condition of the brakes, signal device, steering apparatus, tires, and lighting equipment on said motor vehicle at the time of the accident made the basis of this suit.
- (h) When had the brakes, signal device, steering apparatus, lights and tires on said motor vehicle last been inspected prior to said accident and by whom?
- 3. (a) If you have stated that the owner of the vehicle occupied by you at the time of the accident made the basis of this suit was not the driver on the occasion of said accident, explain fully and in detail the presence of the driver in said vehicle.
- (b) State who was the employer of the driver of the vehicle occupied by you at the time said accident occurred.
- (c) State on whose business or behalf said driver was acting at the time that said accident occurred.
- 4. (a) State the number of persons occupying the motor vehicle in which you were riding on the occasion of and at the time of said accident, and state specifically how and in what manner each of said occupants were located in said vehicle on said occasion.
- (b) State the name and address of each person occupying the motor vehicle in which you were riding on the occasion of said accident and at the time of said accident.
- (c) State fully the purpose of the trip you were making at the time of the accident made the basis of this suit.
- (d) From what point had you departed?
- (e) What was your destination?
- (f) Were you performing a mission, errand, or duty for anybody whatsoever? If so, state the nature of same and the name and address of the person for whom you were performing it.
- (g) Give the name and address of each and every person or firm who had any interest whatsoever in the trip that was being made by the driver of the vehicle in which you were riding on the occasion of and at the time of said accident made the basis of this suit, and state the nature of said interest and the connection of said person or firm with the trip.
- 5. Prepare and attach to your answers to these interrogatories a map portraying the scene of the accident and the physical objects involved in the accident made the basis of this suit and designate on said map the following:
 - (a) The point of impact and skid marks leading up to and from same
 - (b) The resting place of all the vehicles involved in the accident in any way after the accident occurred;
 - (c) The placement of any other vehicles or physical objects which had anything to do with said accident.
- 6. (a) Describe the locus of the accident with reference to the contour of the land, the grade or curve of the road or highway, and

any physical structures located within 200 yards of the place of the accident and where the vehicle in which you were riding came to rest immediately after the accident.

- (b) Describe any traffic controls, signals or traffic signs located within 200 yards of the scene of the accident and within 200 yards of where the vehicle occupied by you came to rest immediately after the accident, and the operation of such controls signals or traffic signs, stating the directions in which said traffic controls, signals or traffic signs faced, and where such controls, signals or traffic signs were located.
- 7.
- (a) State where the motor vehicle in which Mr. Malcolm Chandler was riding was located with reference to the point of the impact of Mr. Chandler's automobile with the automobile occupied by you when you first observed Mr. Chandler's vehicle immediately prior to said accident.
 - (b) Did you see the motor vehicle in which Mr. Malcolm Chandler was riding before the actual collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler?
 - (c) How many feet was the motor vehicle in which Mr. Malcolm Chandler was riding from the place of said collision when you first observed same?
 - (d) How many feet were you from the point of said impact when you first observed the vehicle in which Mr. Malcolm Chandler was riding?
 - (e) Where did said impact occur with reference to the right edge of the street or highway on which the vehicle occupied by you was traveling?
 - (f) Where did said impact occur with reference to the center line of the street or highway on which the vehicle in which Mr. Malcolm Chandler was traveling?
- 8.
- (a) State where the motor vehicle in which Mrs. Cynthia Huschka was riding was located with reference to the point of the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Huschka when you first observed said motor vehicle occupied by Mrs. Huschka immediately prior to said accident.
 - (b) Did you see the motor vehicle in which Mrs. Cynthia Huschka was riding before the actual collision of the vehicle occupied by you with the vehicle occupied by Mrs. Huschka?
 - (c) How many feet was the motor vehicle in which Mrs. Cynthia Huschka was riding from the place of said impact when you first observed same?
 - (d) How many feet were you from the point of said impact when you first observed the vehicle in which Mrs. Cynthia Huschka was riding?
 - (e) Where did said impact with the automobile in which Mrs. Cynthia Huschka was riding occur with reference to the center line of the street or highway on which the vehicle occupied by Mrs. Huschka was traveling?

- (f) Where did the impact with the automobile operated by Mrs. Cynthia Huschka occur with reference to the right edge of the street or highway on which the vehicle occupied by you was traveling?
9. (a) State where the motor vehicle in which the plaintiff was riding was located with reference to the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler when you first observed the automobile in which the plaintiff was riding immediately prior to the accident.
- (b) Did you see the motor vehicle in which the plaintiff was riding before the actual collision with the automobile occupied by Mr. Malcolm Chandler?
- (c) Did you see the motor vehicle in which the plaintiff was riding before the actual impact of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka?
- (d) How many feet was the motor vehicle in which the plaintiff was riding from the place of the impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler when you first observed the motor vehicle in which the plaintiff was riding?
- (e) How many feet was the motor vehicle in which the plaintiff was riding from the place of the impact of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka when you first observed the motor vehicle in which the plaintiff was riding?
- (f) How many feet were you from the point of impact with the automobile occupied by Mr. Malcolm Chandler when you first observed the vehicle in which the plaintiff was riding?
- (g) How many feet were you from the point of impact of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka when you first observed the automobile in which the plaintiff was riding?
10. (a) 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 same as seen by you.
- (b) Describe each and everything which the driver of the vehicle occupied by Mr. Malcolm Chandler failed to do to avoid said accident.
- (c) Describe each and everything which the driver of the vehicle occupied by Mrs. Cynthia Huschka failed to do to avoid said accident.
- (d) Describe each and everything which the driver of the vehicle occupied by Mr. John T. Hadley failed to do to avoid said accident.
- (e) Describe each and everything which the driver of the vehicle occupied by the plaintiff failed to do to avoid said accident.
- (f) Describe each and everything done by the driver of the vehicle occupied by Mr. Malcolm Chandler which contributed to the cause of said accident.

- (g) Describe each and everything done by the driver of the vehicle occupied by Mrs. Cynthis Huschka which contributed to the cause of said accident.
 - (h) Describe each and everything done by the driver of the vehicle occupied by Mr. John T. Hadley which contributed to the cause of said accident.
 - (i) State each and everything done by you or which you omitted to do, which contributed proximately to the cause of the accident.
 - (j) Describe each negligent act or omission of the driver of the vehicle occupied by Mr. Malcolm Chandler on said occasion.
 - (k) Describe each negligent act or omission of the driver of the vehicle occupied by Mrs. Cynthia Huschka on said occasion.
 - (l) Describe each negligent act or omission of the driver of the vehicle occupied by Mr. John T. Hadley on said occasion.
 - (m) Describe each negligent act or omission of the driver of the vehicle in which the plaintiff was riding on said occasion.
- 11.
- (a) Describe each and everything which the driver of any other vehicle involved in the accident failed to do to avoid said accident.
 - (b) State specifically where each of the automobiles driven by any of such persons was located at the time of the initial impact of your automobile with that of Mr. Malcolm Chandler.
 - (c) State the name and address of each such driver which you say failed to do anything to avoid said accident.
 - (d) Describe each and everything done by any other driver of any other vehicle involved in the accident which contributed to the cause of said accident.
 - (e) Describe each negligent act or omission of the driver of any other vehicle involved in the accident which contributed to or caused the accident.
- 12.
- (a) State whether any of the occupants (including yourself) in any of the vehicles involved in the accident made the basis of this suit were intoxicated or were under the influence of intoxicating beverages to any degree at the time of the accident.
 - (b) Please state the name and address of each of said persons who was intoxicated or was under the influence of any intoxicating beverages at said time.
 - (c) State what you had been drinking, in the way of intoxicating beverages prior to the accident, where you had obtained the same, the quantity or amount consumed, and the time and place where same was drunk.
 - (d) State what Mr. Eugene Harrison Wood, IV, had been drinking in the way of intoxicating beverages prior to the accident, where he had obtained the same, the quantity or amount consumed by him, and the time and place where the same was drunk.

- (e) State whether the automobile occupied by you had been stopped by the Alabama Highway Patrol shortly prior to the accident, and, if so, please state where the automobile occupied by you was located at such time, and the name and address of the driver of the automobile occupied by you at the time it was stopped by the Highway Patrol.
- (f) Please state what was said by any of the occupants of the automobile in which you were riding at the time of the accident in the presence of the Highway Patrol officer immediately after the automobile occupied by you was stopped by the Highway Patrol just before the accident and what was said by the Highway Patrol officer in your presence.
- (g) State fully what each of the occupants of the automobile occupied by you was doing at the time it was stopped by the Highway Patrol just prior to the accident.

13. State, according to your best judgment, the speed of the vehicle occupied by Mrs. Cynthia Huschka 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 of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
- (c) At a point 200 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
- (d) At a point 100 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
- (e) At a point 50 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
- (f) At a point 25 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
- (g) At a point 10 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka occurred;
- (h) At the time of the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka;
- (i) Immediately after the impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka.

14. State, according to your best judgment, the speed of the vehicle occupied by Mr. Malcolm Chandler 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 of the

vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;

- (c) At a point 200 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (d) At a point 100 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (e) At a point 50 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (f) At a point 25 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (g) At a point 10 feet from the place where the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler occurred;
 - (h) At the time of the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler;
 - (i) Immediately after the impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler.
15. (a) State in what direction and along what highway each of the motor vehicles involved in the accident made the basis of this suit was traveling on the occasion of said accident.
- (b) State in your best judgment, in number of feet, the width of such highway, at the following points:
- (1) 300 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (2) 200 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (3) 100 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (4) 50 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (5) 25 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (6) 10 feet east of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
 - (7) At the time of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;

- (8) Immediately after the impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (9) 200 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
- (10) 100 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
- (11) 50 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
- (12) 25 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
- (13) 10 feet west of the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler;
- (c) If any of the vehicles involved in the accident made the basis of this suit was engaged in making a turn from the direct line of travel (including passing another vehicle), describe same, and the course followed with reference to the center line or what would be the center of the traveled portion of the highway on which such vehicle was traveling prior to such turn or prior to such passing.
16. (a) State fully, specifically and in detail each and every act or thing done by the driver of the automobile occupied by you at the time of the accident made the basis of this suit during the last 200 feet of the approach of the vehicle occupied by you to the point of collision with the automobile occupied by Mr. Malcolm Chandler, stating in your answer the chronological order in which the driver of said vehicle occupied by you did each of said acts or things.
- (b) Describe each change in the course of travel made by the vehicle occupied by Mr. Malcolm Chandler immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Chandler.
- (c) Describe each change in the course of travel made by the vehicle occupied by Mrs. Cythina Huschka immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mrs. Huschka.
- (d) Describe each change in the course of travel made by the vehicle occupied by Mrs. Cynthia Huschka immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (e) Describe each change in the course of travel made by the vehicle occupied by you immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (f) Describe each change in the course of travel made by the vehicle occupied by you immediately prior to the collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.

17. (a) State whether or not the brakes on the vehicle occupied by you at the time of the accident sued on were applied prior to the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (b) If so, state in your best judgment the speed in miles per hour the vehicle occupied by you was traveling at the moment the brakes were applied.
- (c) State in your best judgment the distance in number of feet the vehicle occupied by you traveled from the moment the brakes were applied until the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler occurred.
- (d) State in your best judgment the distance in number of feet the vehicle occupied by you traveled from the moment the brakes were applied until it came to a stop after the occurrence of the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
18. (a) State specifically what portion of the vehicle occupied by you first came in contact with the vehicle occupied by Mr. Malcolm Chandler.
- (b) State specifically what portion of the vehicle occupied by Mr. Malcolm Chandler first came in contact with the vehicle occupied by you.
- (c) State specifically what portion of the vehicle occupied by you first came in contact with the vehicle occupied by Mrs. Cynthia Huschka.
- (d) State specifically what portion of the vehicle occupied by Mrs. Cynthia Huschka first came in contact with the vehicle occupied by you.
- (e) After the initial impact involving the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler, describe what portion of the automobile occupied by you next came in contact with the automobile occupied by Mr. Malcolm Chandler.
- (f) After the initial impact involving the vehicle occupied by Mr. Malcolm Chandler with the vehicle occupied by you, describe what portion of the automobile occupied by Mr. Malcolm Chandler next came in contact with the automobile occupied by you.
- (g) After the initial impact involving the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka, describe what portion of the automobile occupied by you next came in contact with the automobile occupied by Mrs. Cynthia Huschka.
- (h) After the initial impact involving the vehicle occupied by Mrs. Cynthia Huschka with the vehicle occupied by you, describe what portion of the automobile occupied by Mrs. Cynthia Huschka next came in contact with the automobile occupied by you.
19. (a) 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.

- (b) In what direction did each of said motor vehicles move from the point of said collision until they came to a complete stop?
- (c) Describe each and every skid mark which led up to the point of collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (d) Describe each and every skid mark which led up to the point of collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.
- (e) Describe each and every skid mark which extended from the point of collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler toward the place where either of such motor vehicles came to rest.
- (f) Describe each and every skid mark which extended from the point of collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka toward the place where either of such motor vehicles came to rest.
- (g) Locate the point where each motor vehicle came to rest with reference to the point of impact of the vehicle occupied by you with the vehicle occupied by Mr. Malcolm Chandler, the center of the highway, the end of the bridge, and the right edge of the highway on which each of such motor vehicles had been traveling.
- (h) Locate the point where each motor vehicle came to rest with reference to the point of impact of the vehicle occupied by you with the vehicle occupied by Mrs. Cynthia Huschka, the center of the highway, the end of the bridge, and the right edge of the highway on which each of such motor vehicles had been traveling.

20. State the speed of the motor vehicle occupied by you, according to your best judgment at the following points:

- (a) When you were within a distance of 300 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (b) When you were within a distance of 200 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (c) When you were within a distance of 100 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (d) When you were within a distance of 50 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
- (e) When you were within a distance of 25 feet from the point of impact of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.

21. (a) State whether any horn or other signal was given as a warning by the operator of any of the vehicles involved in the accident made a basis of this suit prior to the time of the collision.
- (b) If so, describe each of said signals given by each respective driver specifically and in detail.
- (c) State how far distant from the point of collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler each vehicle was located at the time said signal was given.
- (d) State how far distant from the point of collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka each vehicle was located from the time said signal was given.
- (e) If any signals for stopping or turning were given by the driver of any of the vehicles involved in the accident immediately prior to the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler, describe same, and state how far distant from the point of such impact each said signal was given by each driver respectively.
- (f) If any signals for stopping or turning were given by either driver immediately prior to the collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka, describe same, and state how far distant from the point of such impact each said signal was given by each driver respectively.
22. (a) 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.
- (b) If so, state the number of such other vehicles and where they were located with reference to the point of the accident at the east end of the Tensaw River bridge at the moment the same occurred.
- (c) 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 of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
- (d) 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 of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka.
- (e) Please state fully and in detail in what manner any such other vehicles located at or near the scene of the accident played any part or contributed in any manner, to cause the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
- (f) Please state fully and in detail in what manner any such other vehicles located at or near the scene of the accident played any part or contributed in any manner, to cause the collision of the automobile occupied by you with that occupied by Mrs. Cynthia Huschka.

- (g) Give the name and address of each driver or owner of each of such other vehicles which contributed in any manner to cause the collision of the automobile occupied by you with the automobile occupied by Mr. Malcolm Chandler.
 - (h) Give the name and address of each driver or owner of each of such other vehicles which contributed in any manner to cause the collision of the automobile occupied by you with the automobile occupied by Mrs. Cynthia Huschka.
23. (a) State whether or not any vehicle other than the one occupied by you played any part, or contributed in any manner, to cause the collision of the automobile occupied by the plaintiff with that occupied by Mr. John T. Handley.
- (b) If your answer to 23(a) is in the affirmative, please state the name and address of the driver or owner of such vehicle, and describe fully how and in what manner each of such other vehicles contributed in any manner to cause the collision of the automobile occupied by the plaintiff with that occupied by John T. Hadley, and state where each of such vehicles were located at such time and the direction each such vehicle was traveling.
24. (a) Did you make any statements to the Highway Patrol officer investigating the accident following the occurrence of the collision of the automobile occupied by you with those occupied by Mr. Malcolm Chandler and Mrs. Cynthia Huschka?
- (b) If so, state when, where and what was said by you.
- (c) Did the Highway Patrol officer investigating the accident involving the collision of the automobile occupied by you with those occupied by Mr. Malcolm Chandler and Mrs. Cynthia Huschka make any statement in your presence following the occurrence of such collision?
- (d) If so, state when where and what was said by said Highway Patrol officer in your presence.
- (e) Did you make any statements 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?
- (f) If so, state when, where and what was said by you.
- (g) Did the plaintiff make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the plaintiff.
- (h) Did the driver of the automobile in which the plaintiff was riding make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of the vehicle in which the plaintiff was riding.
- (i) Did the driver of the vehicle occupied by Mr. Malcolm Chandler make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of such vehicle.

- (j) Did the driver of the vehicle occupied by Mrs. Cynthia Huschka make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by the driver of such vehicle.
 - (k) Did Mr. Eugene Harrison Wood, IV, make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by Mr. Wood, IV.
 - (l) Did any other occupant of the automobile occupied by you make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by such other person, and who such other person was.
 - (m) Did the occupant of any vehicle involved in the accident in any manner make any statement in your presence following the occurrence of the accident, and, if so, state when, where and what was said by such other person, and who such other person was and in what vehicle such other person was riding at the time of the accident.
 - (n) Give the name and address of each and every person who was present at each time any such statements were made either by you, or by the driver of the vehicle in which the plaintiff was riding or by the driver of any other of the vehicles or by any of the occupants of any of the vehicles in any manner involved in the accident, following the occurrence of said accident.
 - (o) Give the name and address of each and every person who was present when the accident made the basis of this suit occurred.
 - (p) Give the name and address of each and every person who was present at the time of the collision of the automobile in which the plaintiff was riding with the automobile occupied by Mr. John T. Hadley.
- 25.
- (a) Who gave you permission to use the automobile you were occupying on the occasion when you had the accident made the basis of this suit?
 - (b) Please state how many times you had driven an automobile or had ridden in an automobile prior to the accident on U. S. Highway 31 from a point 300 feet east of where the accident occurred to the point of the collision of the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
 - (c) Please state how many times and when such times occurred when you had driven ^{or ridden} over such portion of said highway.
 - (d) Please state whether you were familiar with the portion of the highway 300 feet east from the point of the impact to the place where the collision occurred involving the automobile occupied by you with that occupied by Mr. Malcolm Chandler.
 - (e) Please state whether or not you were familiar with the portion of U. S. Highway 31, 300 feet east of the Tensaw River Bridge to the east end of said bridge.
 - (f) If so, how many times had you driven an automobile or ridden in an automobile over such portion of said highway?

26. (a) Please state the purpose of your trip being made by the occupants of the vehicle occupied by you at the time the accident made the basis of this suit occurred.
- (b) Were the occupants of the vehicle in which you were riding all on their way to the football game at Ladd Memorial Stadium between Alabama and Tulane?
- (c) If your answer to the foregoing is in the negative, please state where each of the occupants of the vehicle occupied by you were going at the time said accident occurred.
- (d) Were you a friend of or acquainted with Eugene Harrison Wood, IV, at the time of the accident?
- (e) If your answer to the foregoing is in the affirmative, please state how long you had known Eugene Harrison Wood, IV, and where you had known him prior to the accident.
- (f) Please state whether you gave Eugene Harrison Wood, IV, permission or authorized him to operate the automobile occupied by you at the time of the accident made the basis of this suit.
- (g) If your answer to the foregoing is in the affirmative, please state when and where he was so authorized, and when and where he started driving the automobile prior to the accident made the basis of this suit.
- (h) Please state whether Eugene Harrison Wood, IV, was driving the automobile at any time between Bay Minette, Alabama, and Mobile, Alabama, prior to the collision made the basis of this suit?
- (i) Please state whether you were driving the automobile at any time between Bay Minette, Alabama, and Mobile, Alabama, prior to the collision made the basis of this suit.
- (j) If your answer to the foregoing is in the affirmative, please state when and where ^{and} /along what route you drove said automobile between Bay Minette and Mobile prior to said collision.
- (k) Did you see the automobile occupied by Mrs. Cynthia Huschka at any time while the vehicle occupied by you was between Bay Minette and the place where the collision occurred prior to the collision?
- (l) If your answer to the foregoing question is in the affirmative, please state when and where you saw the automobile occupied by Mrs. Cynthia Huschka prior to the accident, and where it was located each time you saw it with reference to the automobile occupied by you.
- (m) What time did you leave Bay Minette prior to the time the accident occurred?
- (n) Did the vehicle occupied by you make any stops on your way to Mobile from Bay Minette prior to the time of the accident?
- (o) If your answer to the foregoing is in the affirmative, please state when and where such stops were made and state the purpose of each such stop.

(p)

Please state whether the automobile occupied by you at the time of its collision with the automobile occupied by Mr. Malcolm Chandler was stopped on the day of the accident by an Alabama Highway Patrol officer prior to the time the accident occurred and, if so, please state what was said and done by the Highway Patrol officer in your presence at each such time, what was said and done by you, by Eugene Harrison Wood IV, and by Dawson Blalock, in your presence and on each occasion, when and where each such stop occurred, and the name of such Highway Patrol officer, and what you, Eugene Harrison Wood, IV, and Dawson Blalock were each doing immediately prior to each such stop.

J. Terry Reynolds, Jr.
William R. Lauten
Attorneys for Plaintiff

STATE OF ALABAMA)
COUNTY OF MOBILE)

Before me, the undersigned authority in and for said County in said State, personally appeared William R. Lauten, who, having been by me first duly sworn, deposes and says that he is one of the attorneys for the Plaintiff in the above styled cause, and that, if the foregoing interrogatories are truthfully answered, the answers will be material evidence for the Plaintiff on a trial of this case.

William R. Lauten
Affiant

Sworn to and subscribed before me this
18th day of April, 1960.

Miriam H. Hill
Notary Public, Mobile County, Alabama.

Service may be had on the defendant by service of a copy of these interrogatories on Honorable J. B. Blackburn, attorney of record, Bay Minette, Alabama

Received 27 day of April 1960
and on 27 day of April 1960
I served a copy of the within Order
on J.B. Blackburn
By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbot D.B.
om

4187
Clara Sheppard Jones
v.
Eugene Harrison Wood.

FILED

APR 27 1960

ALICE L. DUCK, CLERK
REGISTER

To be served no

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

CLARA SHEPPARD JONES

NO. 4187

EUGENE HARRISON WOOD, IV
ET AL

The defendant, Eugene Harrison Wood, IV, on the 11th day of August, 1960, in the offices of Taylor & Inman, Attorneys at Law, Morristown, Tennessee, being first duly sworn by William H. Inman, a Notary Public, for Hamblen County, Tennessee, answered the interrogatories propounded to him, as follows:

- 1- (a) Eugene Harrison Wood, IV, twenty, 1521 Jones Avenue, Morristown, Tennessee. I work at Gluck Bros., Inc., Morristown, Tennessee
- (b) Yes
- (c) N. A.
- 2- (a) 1959 Chevrolet Corvette, Sports car.
- (b) Eugene Harrison Wood, IV, 417 Battery Avenue, Selma, Ala.
- (c) Martin W. Williamson, Bay Minette, Alabama
- (d) Front, left side, practically a total loss
- (e) The Chevrolet garage in Bay Minette said the Corvette was a total loss. I do not know about estimates.
- (f) Not repaired that I know of; sold for salvage
- (g) All operating normally
- (h) I don't know.
- 3- (a) I don't understand this question. I asked Williamson to let me

drive his car because I wanted to.

(b) I was working at the Cleveland Table Company, Selma, Ala.

4. (a) I was driving; Williamson was in the middle; Dawson Blalock was on the right side.

(b) Myself, address already stated; Martin Williamson, Bay Minette, Alabama; Dawson Blalock, Selma, Alabama

(c) We were going to a football game

(d) Selma, Alabama

(e) Ladd Stadium, Mobile, Alabama

(f) No

(g) Previously answered

5. (a) See attached

6. (a) The accident happened at the east end of the Tensaw Bridge

(b) East of the collision scene were yellow lights flashing warning traffic to get into left lane

7. (a) Directly in front of me

(b) Yes

(c) A few feet

(d) A few feet

(e) Right side

(f) I was about straddling the white line.

8. (a) When we wrecked, she was on my right

(b) Yes

(c) She was at the flashing lights; 100 to 150 yards, I guess

(d) Same answer

(e) I don't understand the question

(f) On the right side