NO. 13,916

IN THE DISTRICT COURT OF
ORANGE COUNTY, TEXAS.

CLAUDE J. TOMPLAIT

VS.

THE TRAVELERS INSURANCE COMPANY

NOTICE TO TAKE DEPOSITION OF
MR. JOHN W. BRADLEY
AND
DIRECT INTERROGATORIES

FILED

22 Day of 9-6 1963

at 8:30 A.M.

ETHEL BURTON

Clerk, District Court, Orange County, Texas

By Eloise Ennis Deputy

STRONG, PIPKIN, STRONG & NELSON
ATTORNEYS AT LAW
318 McFADDIN BUILDING - P. O. BOX 1634
BEAUMONT, TEXAS

NO. 13,916

CLAUDE J. TOMPLAIT	)	IN THE DISTRICT COURT OF
VS.	)	
THE TRAVELERS INSURANCE COMPANY, ET AL.	)	ORANGE COUNTY, TEXAS

TO: Claude J. Tomplait, Plaintiff, through his attorney of record, Mr. Ward Stephenson, Stephenson Building, Orange, Texas.

NOTICE is hereby given to Claude J. Tomplait, plaintiff in this case, and/or his attorney of record that five (5) days after service of this Notice and of the interrogatories hereto attached, the defendant, The Travelers Insurance Co. and/or its attorneys of record, shall apply to the Clerk of the District Court of Orange County, Texas, for a commission to take the deposition of Mr. John W. Bradley, a witness who is Unemployment Insurance Supervisor of the Texas Employment Commission, at Austin, Travis County, Texas, in accordance with the attached interrogatories, which deposition will be used as evidence in the above-entitled and numbered cause.

CHARLES S. PIPKIN

Gordon Pat

919 McFaddin Bldg., P. O. Box 1632
Beaumont, Texas

Attorneys for Defendant,
The Travelers Insurance Co.

A copy of the foregoing Notice and Interrogatories was mailed to Mr. Ward Stephenson, Stephenson Bldg., Orange, Texas,

on the 27 day of February, 1963.

Gordon Pat

DIRECT INTERROGATORIES TO BE PROPOUNDED TO:

Mr. John W. Bradley
Unemployment Insurance Supervisor
Texas Employment Commission
Austin, Texas

Interrogatory Number

1. Please state your full name and address.

2. Please state by whom you are employed and what your position is.

3. Do you have in your custody all records of initial claims and continued claims filed with the Texas Employment Commission?

4. Please state whether or not these records are kept in the regular course of the business of the Texas Employment Commission?

5. Please state whether as Unemployment Insurance Supervisor you have the custody and control of the records of all persons filing claims for unemployment compensation?

6. Do you have in your control and custody any initial claims on one Claude J. Tomplait, Social Security No. [redacted] ?

7. If your answer to the foregoing interrogatory was "Yes" then please have the Court Reporter mark each of said claims for identification and attach a copy of all initial claims filed by or on behalf of Claude J. Tomplait on or after July, 1961

8. Do you have in your control and custody any continued claims (compensable claims) on one Claude J. Tomplait, Social Security No. [redacted] ?

9. If your answer to the foregoing interrogatory was "Yes", then please have the Court Reporter mark each of said claims for identification and attach a copy of all continued claims (compensable claims) filed by or on behalf of the above-named individual on or after July, 1961

10. Do you have in your control and custody the records showing the initial determination on the claim of Claude J. Tomplait, Social Security No. [redacted] ?

11. If your answer to the foregoing interrogatory was "Yes", then please have the Court Reporter mark such determination for identification and attach a copy thereof.

Interrogatory
Number

12. Please have the Court Reporter mark for identification all other determinations, modifications, or decisions by the Texas Employment Commission, or any representative thereof, in connection with all initial claims and continuing claims of Claude L. Tomplait Social Security No. [redacted] since July, 1961 that you have in your custody and control, and attach a copy of each.

13. In your position as Unemployment Insurance Supervisor for the Texas Employment Commission, do you hereby certify that the attached initial claims, continued claims, determinations, modifications, or decisions, if any, are true and correct copies of such documents appearing in the office of the Texas Employment Commission, which are kept in the regular course of business of Texas Employment Commission, and of which you have custody and control?

CHARLES S. PIPKIN

Gordon Cates

319 McFaddin Bldg., P. O. Box 1632
Beaumont, Texas

Attorneys for Defendant,
The Travelers Insurance Co.