NO. 13,916

IN THE DISTRICT COURT OF

ORANGE COUNTY, TEXAS.

CLAUDE J. TOMPLAIT

VS.

THE TRAVELERS INSURANCE COMPANY

NOTICE TO TAKE DEPOSITION OF
DR. JOHN C. GRECO
AND
DIRECT INTERROGATORIES

FILED

7 Day of March 1963

at 2 P M

Ethel Burton

Clerk District Court, Orange County, Texas

STRONG, PIPKIN, STRONG & NELSON

ATTORNEYS AT LAW

919 McFADDIN BUILDING - P.O. BOX 1638

BEAUMONT, TEXAS

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CLAUDE J. TOMPLAIT	)	IN THE DISTRICT COURT OF
VS.	)	
THE TRAVELERS INSURANCE COMPANY	)	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 cause, 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 Company, 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 Dr. John C. Greco, a witness, who has his office at 2832 Texas Street, Bridge City, Orange County, Texas, in accordance with the attached interrogatories, and for a subpoena duces tecum requiring said witness to produce all medical records, office records, correspondence received by him and correspondence directed by him to others, and claim forms pertaining to Claude J. Tomplait.

CHARLES S. PIPKIN

Gordon R. Pate

Attorneys for Defendant,
The Travelers Insurance Company

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

A copy of the foregoing Notice and interrogatories was mailed to Mr. Ward Stephenson, Stephenson Bldg., Orange, Texas, attorney for plaintiff, on the 6 day of March, 1963.

Gordon R. Pate

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Direct Interrogatories to be propounded to Dr. John C. Greco, 2832 Texas Street, Bridge City, Texas:

Interrogatory Number

1. Is your name John C. Greco?

2. Has a man by the name of Claude J. Tomplait come to you for examination or treatment at any time in or after July, 1961?

3. When was the first time that you saw Claude J. Tomplait in or after July, 1961?

4. Please state what history, if any, that you obtained on the first time that you saw Mr. Tomplait in or after July, 1961.

5. How many times did you see Mr. Tomplait after July, 1961, and on what dates, and what were his complaints?

6. When did you discharge Mr. Tomplait from further treatment after July, 1961?

7. Have you seen Mr. Tomplait for any accident and/or illness or disease since July, 1961, and if so, with respect to each accident, illness or disease, please give the date of the accident and/or illness or disease and the part of the body that Mr. Tomplait was complaining of, and the nature and duration of the illness.

8. Have you written any reports to anyone concerning the physical or mental condition of Mr. Tomplait since July, 1961?

9. If you have answered the foregoing interrogatory "Yes," then please hand to the Court Reporter one copy of each of such letters or other written memoranda that you have forwarded to any person, firm or corporation so that he may mark same for identification, have same photostated and attached to this deposition, and return the original to you.

10. Have you received any letters, written memoranda or forms from any person, firm or corporation concerning the physical and mental condition of Claude J. Tomplait since July, 1961?

11. If you have answered the foregoing interrogatory "Yes," then please hand to the Court Reporter a copy of any such letters or other written memoranda that you have received from any person, firm or corporation so that he may mark same for identification, have same photostated and attached to this deposition and return the original to you.

12. Do you have any written notes, patients' cards, forms or written office records concerning Claude J. Tomplait in or after July, 1961?

13. If you have answered the foregoing interrogatory "Yes," then please read to the court reporter the information

contained on such written notes, patients' cards, forms or written office records, identifying the type of record from which such information is being read and the date thereof.

14. Have you had occasion to examine or treat Mr. Tomplait for an accident and/or illness or disease prior to July, 1961?

15. If you have answered the foregoing interrogatory "Yes," then please state with respect to each accident and/or illness or disease complained of the following: (a) the date of the alleged accident, illness or disease; (b) the part of the body Mr. Tomplait was comlaining of; and (c) who you sent written reports to. Also, please hand to the Court Reporter a copy of each of such written reports with respect to each accident, illness, or disease complained of prior to July, 1961, so that he may mark same for identification; have the same photostated and attached to this deposition, and then return the originals to you.

16. Please hand to the Court Reporter any written notations or other written office records that you have pertaining to Claude J. Tomplait concerning any examinations or treatments prior to July, 1961, in order that he may mark same for identification, have the same photostated and attached to this deposition, and then return the originals to you.

CHARLES S. PIPKIN

Gordon Pate

Attorneys for Defendant,
The Travelers Insurance Company

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