NO. 13,916

IN THE DISTRICT COURT OF
ORANGE COUNTY, TEXAS

CLAUDE J. TOMPLAIT

VS.

THE TRAVELERS INSURANCE CO.

NOTICE TO TAKE DEPOSITION OF
DR. W. V. LEARY
AND DIRECT INTERROGATORIES

FILED
8 Day of March 1963
at 9:00 A M.
ETHEL BURTON
Clerk, District Court, Orange County, Texas
By Vera Sanford Deputy

STRONG, PIPKIN, STRONG & NELSON
ATTORNEYS AT LAW
319 McFADDIN BUILDING, P. O. BOX 1631
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. W. V. Leary, a witness, who has his office at the Kelsey-Leary-Seybold Clinic, 6655 Travis Street, Houston, Harris 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

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 7 day of March, 1963.

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Direct Interrogatories to be propounded to Dr. W. V. Leary of the Kelsey-Leary-Seybold Clinic, 6655 Travis Street, Houston 25, Texas.

Interrogatory Number

1. Please state your name and residence.
2. What business or profession are you engaged in?
3. Are you duly licensed to practice your profession in the State of Texas?
4. Is your license on file in the county in which you practice?
5. How long have you been practicing your profession?
6. Are you a graduate of a medical school, and, if so, please state the name of the school and the year of your graduation.
7. What branch of the medical profession are you engaged in?
8. Are you a member of any Boards or Societies? If so, please list.
9. Have you had an occasion to see Mr. Claude J. Tomplait professionally?
10. What is the date that you first saw Claude J. Tomplait professionally, and where did you see him?
11. Did you have occasion to examine Claude J. Tomplait?
12. Did you have an occasion to treat Claude J. Tomplait?
13. Please state the dates that you saw Claude J. Tomplait professionally.
14. Did you obtain a history from Claude J. Tomplait?
15. If you answered the foregoing interrogatory that you obtained a history, then explain what a history is.
16. Please state what history you obtained from Claude J. Tomplait.
17. Where did you obtain the history?
18. Is the history something that Claude J. Tomplait himself told or related to you?
19. What was the nature of the complaints or symptoms that Claude J. Tomplait gave you?
20. What parts of his body did Claude J. Tomplait complain of?
21. Please state how long Claude J. Tomplait had been suffering from the condition, if any, that you saw him for.
22. Please state what your findings were as a result of your examination of Claude J. Tomplait.
23. How long did Claude J. Tomplait tell you he had been suffering from the condition that you saw him for?
24. What were his complaints on the date that you first saw him?

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25. Had Claude J. Tomplait had any similar trouble or complaints prior to December 10, 1960?

26. Do you have an opinion as to whether his work with Armstrong Contracting & Supply Corporation from December 11, 1960 to August 27, 1961 had anything to do with the condition for which you saw him?

27. If you have an opinion, then please give same and explain the basis for your opinion.

CHARLES S. PIPKIN

Gordon Pate

Attorneys for Defendant,
The Travelers Insurance Company

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Beaumont, Texas

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