NO. 63,916

CLAUDE J. TOMPLAIT

VS.

THE TRAVELERS INSURANCE COMPANY, ET AL

NOTICE OF INTENTION TO TAKE WRITTEN INTERROGATORIES OF GENERAL MANAGER OF THE ABER COMPANY

FILED

27th Day of February 1964

1:25 P. M.

H. L. BURTON

District Clerk, Orange County, Texas

Edna Cannon Deputy

LAW OFFICES
STEPHENSON, STEPHENSON AND THOMPSON
STEPHENSON BUILDING
ORANGE, TEXAS

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NO. A-13,916

IN THE 128TH DISTRICT COURT OF ORANGE COUNTY, TEXAS

CLAUDE J. TOMPLAIT	:	
	:	NOTICE OF INTENTION TO TAKE
VS.	:	WRITTEN INTERROGATORIES OF
	:	GENERAL MANAGER OF
THE TRAVELERS INSURANCE COMPANY	:	THE ABER COMPANY
	:	

TO: TRAVELERS INSURANCE COMPANY, Defendant, and Strong, Moore, Pipkin & Nelson, P. O. Box 1632, Beaumont, Texas, Attorney for Defendant Travelers Insurance Company;

TEXAS EMPLOYERS INSURANCE ASSOCIATION, Defendant, and Marcus & Weller, P. O. Box 350, Beaumont, Texas, Attorney for Defendant Texas Employers Insurance Association;

QUEEN INSURANCE COMPANY OF AMERICA, Defendant, and Orgain, Bell & Tucker, First Federal Savings Building, Beaumont, Texas; Attorneys for Defendant Queen Insurance Company of America:

Notice is hereby given to the Defendants in the above entitled and numbered cause, and their attorneys of record, that five (5) days after service of this notice and of the interrogatories hereto attached, the plaintiff will apply to the clerk of this court for a commission to take the deposition of the general manager of The Aber Company, in accordance with the attached written interrogatories, which deposition will be used as evidence in the above entitled and numbered cause.

STEPHENSON, STEPHENSON AND THOMPSON

By Ward Stephenson
Attorneys for Plaintiff
Stephenson Building
Orange, Texas

A copy of the foregoing notice and interrogatories were mailed to the respective attorneys hereinabove mentioned, at their addresses shown, by certified mail, on this the 24 day of February, 1964.

Ward Stephenson
Ward Stephenson

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NO. A-13,916

IN THE 128TH DISTRICT COURT OF ORANGE COUNTY, TEXAS

CLAUDE J. TOMPLAIT	:	
VS.	:	INTERROGATORIES TO BE PROPOUNDED TO GENERAL MANAGER OF THE ABER COMPANY
THE TRAVELERS INSURANCE COMPANY, ET AL	:	

No. 1 Please state your full name and address.

No. 2 By whom are you employed and in what capacity?

No. 3 Please state the date that Claude J. Tomplait was employed by your company.

No. 4 Please state the date that the employment of Claude J. Tomplait with your company ended.

No. 5 Please state the exact location where Mr. Tomplait worked for your company. For example, the Bridge City power house of Gulf States Utilities Company.

No. 6 Please state whether or not Claude J. Tomplait was employed by you as an insulator.

No. 7 If Mr. Tomplait was not employed as an insulator, in that capacity was he employed?

No. 8 Please state exactly what types of insulation was used by Mr. Tomplait in his work for your company, giving the manufacturers' name and address.

No. 9 Please give the full description of what this insulation consisted of, such as fiberglas, rock wool, foam glass, thermasbestos, etc.

STEPHENSON, STEPHENSON AND THOMPSON

By Ward Stephenson
Attorneys for Plaintiff
Stephenson Building
Orange, Texas

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