NO. 13,916

CLAUDE J. TOMPLAIT

VS.

THE TRAVELERS INSURANCE COMPANY, ET AL

MOTION TO PERMIT INDEPENDENT STRIKES

FILED

16th Day of November 1964

at 1:25 P M.

ETHEL BURTON

Clerk, District Court, Orange County, Texas

By Wilma Freeman Deputy

ORGAIN, BELL & TUCKER

ATTORNEYS AT LAW

BEAUMONT, TEXAS

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CB:bh 9-14-64

NO. 13,916

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

MOTION TO PERMIT INDEPENDENT STRIKES

COMES NOW the defendant, Queen Insurance Company of America, and says that in the above captioned cause it is named as a defendant and that its interests are adverse to its co-defendants and that it has affirmatively sought contribution or indemnity in the event of an adverse judgment against it and that the interests of the various defendants are not compatible and that, therefore, this defendant is entitled to its individual strikes.

WHEREFORE, PREMISES CONSIDERED, defendant moves and prays this Honorable Court that it be permitted to have six independent strikes of the other parties and for such other relief as it may show itself entitled to receive.

ORGAIN, BELL & TUCKER
First Federal Savings Building
Beaumont, Texas
ATTORNEYS FOR DEFENDANT,
QUEEN INSURANCE COMPANY
OF AMERICA

By _____
Cleve Bachman

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