NO. 13,916

IN THE DISTRICT COURT OF

ORANGE COUNTY, TEXAS

CLAUDE J. TOMPLAIT

VS.

THE TRAVELERS INSURANCE COMPANY, ET AL

M O T I O N

FILED

14th Day of September 1964

at 1:30 P M.

ETHEL BURTON

Clerk, District Court, Orange County, Texas

By Wilma Hargrave Deputy

STRONG, PIPKIN, STRONG & NELSON

ATTORNEYS AT LAW

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BEAUMONT, TEXAS

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VS.	§	
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M O T I O N

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES The Travelers Insurance Company, one of the defendants in the above entitled and numbered cause, and would respectfully show unto the Court as follows:

1.

That this defendant is one of three defendants in the above styled and numbered cause and that, as shown by the pleadings on file herein by the plaintiff and defendants, there is no unity of interest among the defendants, and the interests of each defendant towards the other defendants are conflicting, and there is an actual antagonism among defendants as to where the ultimate liability, if any, will fall, and that this is a fact issue upon which the jury may probably be called to determine; therefore, this defendant would respectfully move the Court to allow it six (6) peremptory challenges independent and apart from the other defendants.

Respectfully submitted,

STRONG, PIPKIN, STRONG & NELSON

Michael D. Matheny

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The Travelers Insurance Company

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