NO. 13,916

CLAUDE J. TOMPLAIT

VS.

THE TRAVELERS INSURANCE COMPANY, ET AL

NOTICE & APPLICATION TO TAKE WRITTEN DEPOSITION – WRITTEN INTERROGATORIES ATTACHED

FILED
17th Day of Sept 1964
at 9:30, A. M.
—TIMEL PIPTON
District Court, Orange County, Texas
By Edna Ermon Deputy

ORGAIN, BELL & TUCKER
ATTORNEYS AT LAW
BEAUMONT, TEXAS

Honorable Ethel Burton
District Clerk
Orange County, Texas
Orange County Courthouse
Orange, Orange County, Texas

Re: No. 13,916 - Claude J. Tomplait vs. The Travelers Insurance Company, et al

Dear Sir:

Notice is hereby given that Queen Insurance Company of America

Defendant in the above styled and numbered suit pending in the court of which you are Clerk desires to take the written deposition of the witness named below, at the time and place designated below, to be used in the above styled and numbered suit; and intends to apply for a commission therefor; and hereby requests that you issue commission therefor six days after the receipt of this notice and application by you.

Name of Witness, and Residence or Place where Witness may be found	Place of Taking Deposition	Time of Taking Deposition
Custodian of Records of the Tax Department, Texas Employment Commission	Austin, Texas	Immediately upon receipt of commission therefor.

Subpoena duces tecum is desired, and it is therefore requested that the commission expressly authorize issuance thereof.

Copy of the written interrogatories to be propounded to the witness, ~~if any~~, is attached hereto.

Notice, as required by the Texas Rules of Civil Procedure, Rules 189 and 200, has been given by serving all adverse parties, or their attorneys of record, with a copy hereof on this the 16th day of September, 1964.

The books, papers, documents and tangible things hereby designated to be produced by the witness are:

Name of Witness	To Produce:
Custodian of Records of the Tax Department, Texas Employment Commission	All records pertaining to Claude J. Tomplait since June 30, 1962.

cc by certified mail:
Mr. Ward Stephenson
Attorney at Law
Stephenson Building
Orange, Texas

Yours very truly,
ORGAIN, BELL & TUCKER
First Federal Savings Building
Beaumont, Texas
By
Cleve Bachman

~~Return on reverse side~~

Honorable Ethel Burton
District Clerk
Orange County, Texas
Orange County Courthouse
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Stephenson Building
Orange, Texas

Yours very truly,
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First Federal Savings Building
Beaumont, Texas
By Cleve Bachman

~~Return on reverse side~~

DIRECT INTERROGATORIES TO BE PROPOUNDED TO THE WITNESS CUSTODIAN OF RECORDS, TAX DEPARTMENT, TEXAS EMPLOYMENT COMMISSION

1. State your name.

2. State your occupation and employer.

3. What is your official title?

4. What do your duties ordinarily include?

5. State whether or not the maintenance and preservation of the taxable wage records of the Tax Department of Texas Employment Commission are under your custody and supervision.

6. Are the records of the taxable wages of the Tax Department of Texas Employment Commission made and maintained in the regular course of business of said Commission?

7. Is the Commission required by law to keep such records?

8. Are the taxable wage records of the Tax Department of Texas Employment Commission official records of an agency or office of the State of Texas?

9. In your capacity as Custodian of Records of the Tax Department for the Texas Employment Commission, do you have in your custody the records of the taxab[redacted]orted for Claude J. Tomplait, Social Security No. [redacted] since June 30, 1962?

10. If you state you have custody of the records showing the ta[redacted] reported for Claude J. Tomplait [redacted], Social Security [redacted], since June 30, 1962, please state what all of those records show for that period, or hand to the court reporter photostatic copies of those records.

11. State whether or not the copies attached in response to question No. 10 are certified by your department and yourself to be true and exact copies of the original records maintained as official records by the Tax Department of the Texas Employment Commission in the regular course of the business of said Commission, which have been under your care and custody.

12. State whether or not the original records or the attached photostatic copies have been in any way altered, changed or tampered with.

ORGAIN, BELL & TUCKER
First Federal Savings Building
Beaumont, Texas

By _____
Attorney for Defendant
Cleve Bachman