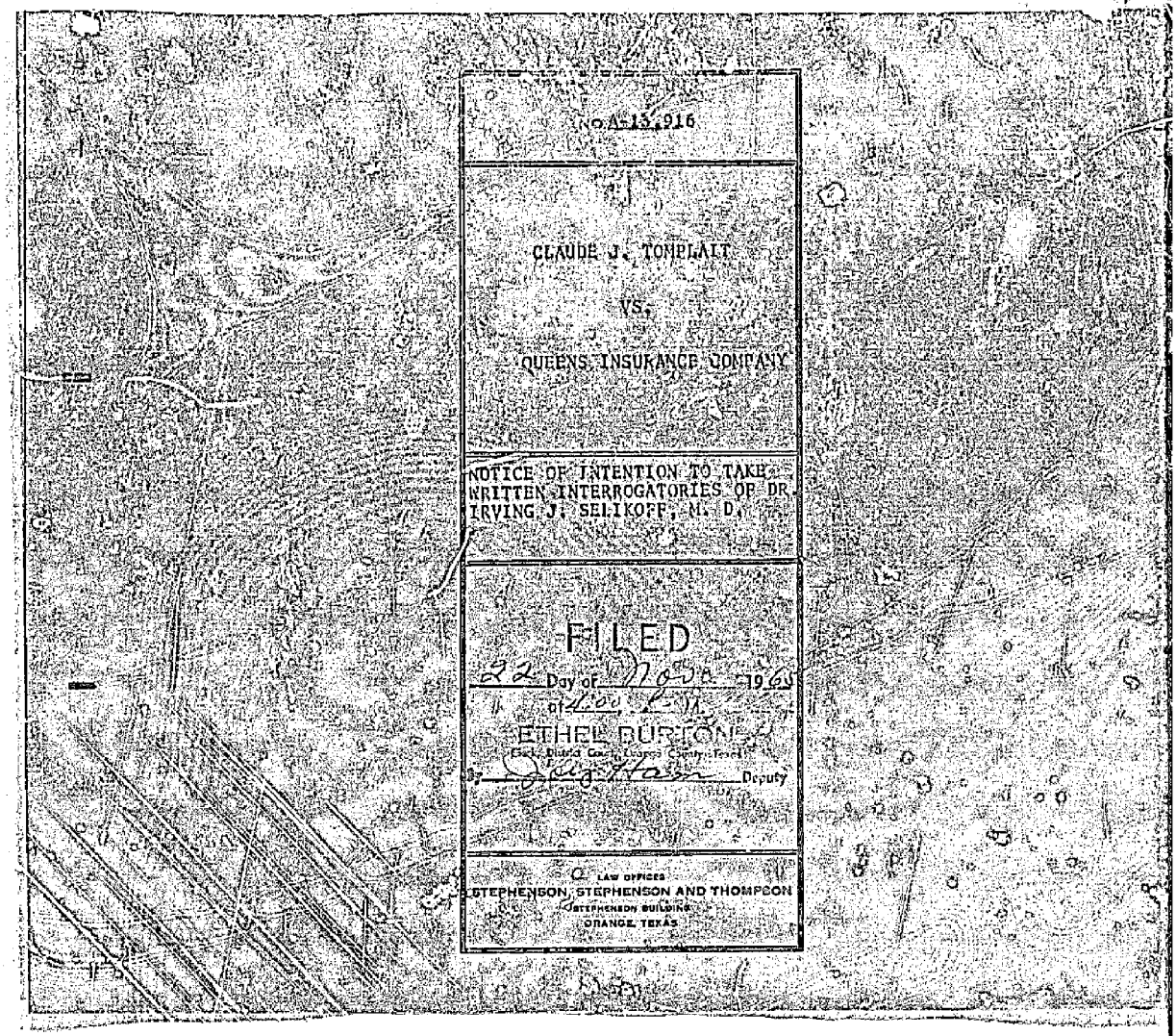


NO. A-15,916

CLAUDE J. TOMPLAIT

VS.

QUEENS INSURANCE COMPANY

NOTICE OF INTENTION TO TAKE WRITTEN INTERROGATORIES OF DR. IRVING J. SELIKOFF, M. D.

FILED

22 Day of Nov. A.D. 1965

at 4:00 P.M.

ETHEL BURTON

Clerk District Court, Jefferson County, Texas

By Doris Vaca 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 WRITTEN INTERROGATORIES OF DR. IRVING J. SELIKOFF, M.D.
VS.	:	
QUEENS INSURANCE COMPANY	:	

TO: QUEENS INSURANCE COMPANY, and ORGAIN, BELL AND TUCKER, First Federal Savings Building, Beaumont, Texas, Attorneys for Defendant:

Notice is hereby given to the defendant in the above entitled and numbered cause, and its attorneys of record, that five (5) days after service of this notice and of the interrogatories hereto attached, the plaintiff Claude J. Tomplait will apply to the clerk of this court for a commission to take the deposition of Dr. Irving J. Selikoff, M. D., Head of the Section of Environmental Health, The Mount Sinai Hospital, New York 29, New York, 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 Orgain, Bell and Tucker, First Federal Savings Building, Beaumont, Texas, attorneys for defendant, by certified mail on this the 22nd day of November, 1965.

Ward Stephenson
WARD STEPHENSON

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NO. A-13,916

IN THE 128TH DISTRICT COURT OF ORANGE COUNTY, TEXAS

CLAUDE J. TOMPLAIT	:	WRITTEN INTERROGATORIES TO
VS.	:	BE PROPOUNDED TO
		DR. IRVING J. SELIKOFF, M. D.
QUEENS INSURANCE COMPANY	:	

Written interrogatories to be propounded to Dr. Irving J. Selikoff, Head of the Section of Environmental Health, The Mount Sinai Hospital, New York 29, New York, on behalf of the plaintiff:

Interrogatory No. 1	Please state your name, residence and place of business.
Interrogatory No. 2	Please state your profession.
Interrogatory No. 3	Please state how long you have been engaged in the practice of such profession.
Interrogatory No. 4	Please state where you received your preliminary training.
Interrogatory No. 5	Please state where you received your intern training.
Interrogatory No. 6	Please state what additional training you have had.
Interrogatory No. 7	Please state whether or not your license to practice medicine is on record in some county in the State of New York; if so, state which county.
Interrogatory No. 8	Do you practice medicine as a full time occupation?
Interrogatory No. 9	Are you associated with any clinic or medical group? If so, please state the name.
Interrogatory No. 10	Do you belong to any professional society or group? If so, please state which ones.
Interrogatory No. 11	Do you practice in any field of medical specialty? If so, please state in which specialty you engage.

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Interrogatory No. 12	If you have had any specialized medical training, please state what it was and where such specialized medical training was taken.
Interrogatory No. 13	For the benefit of the jury, please state your age and the number of years you have been actively engaged in the practice of medicine.
Interrogatory No. 14	Have you ever written any articles concerning your field of specialty, given any lectures, or received any special awards or citations for service in your field of specialty?
Interrogatory No. 15	Pleas state where you are presently resi and practicing medicine.
Interrogatory No. 16	Pl ate whether or not you ha had occasion to see any x-r ms of the plaintiff, Claude J. Tomplait.
Interrogatory No. 17	If you have answered "Yes" to Interrogatory No. 16, please state the date of your examination of such x-ray films.
Interrogatory No. 18	In all of your answers to the questions calling for medical opinion and conclusion, please state such based upon reasonable medical certainty.
Interrogatory No. 19	Were the x-ray films that you previously examined sent to you by Orange Memorial Hospital, in Orange, Texas, and did such films bear the appropriate x-ray markings, identifying them as being x-rays taken of Claude J. Tomplait?
Interrogatory No. 20	Please state your diagnosis, based upon your examination of such x-rays, of the condition from wh ch plaintiff is suffering, basing your answers to this question upon reasonable medical certainty.
Interrogatory No. 21	Please state to the jury your background of study and knowledge dealing with the illness of asbestosis, fully explaining to the jury the background of your qualifications so that the jury might be able to judge for themselves your experience in this field and the weight that they might

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wish to give to your testimony.

Interrogatory No. 22

As to the inquiry above as to your diagnosis and by that is meant what you in your medical judgment believe the x-rays portray of this patient, please state the detailed basis for your conclusion.

Interrogatory No. 23

It may be contended in this case by some medical witness that the x-ray films portray a case of emphysema as distinguished from that of asbestosis. Will you please state what features of the x-rays, in your opinion, differentiate and distinguish Mr. Tomplait's situation from that of emphysema, non-occupational in origin, if you have in fact answered the previous inquiries to the effect that you believe this patient is suffering from asbestosis.

STEPHENSON, STEPHENSON
AND THOMPSON

By Ward Stephenson
Ward Stephenson
Attorneys for Plaintiff
Stephenson Building
Orange, Texas