IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

FIBREBOARD PAPER PRODUCTS COMPANY :

OBJECTION TO PLAINTIFF'S ~~REQUESTED~~ COURT'S CHARGE

FILED
MAY 16 1969
James R. Cooney, Clerk, U. S. Court
By Hazel E. Studdard DEPUTY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the plaintiff, after the arguments and submission of the charge to the jury, and objects and excepts to the Court's charge for the grounds in addition to that stated into the record by dictation to the court reporter, and with the Court's permission, and says that the Court should have submitted to the jury plaintiff's requested charge of gross negligence and punitive damages.

STEPHENSON, THOMPSON AND MORRIS

By Ward Stephenson
Attorneys for Plaintiff

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

FIBREBOARD PAPER PRODUCTS COMPANY :

FILED

MAY 16 1969 19
James R. Cooney, Clerk, U.S. Court
By Abigail E. Studdard DEPUTY

PLAINTIFF'S OBJECTION TO COURT'S CHARGE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the plaintiff, after the arguments and submission of the charge to the jury, and objects and excepts to the Court's charge for the grounds in addition to that stated into the record by dictation to the court reporter, and with the Court's permission, and says that the Court should have charged the jury that the defendant was negligent under the evidence in this case.

STEPHENSON, THOMPSON AND MORRIS

By Ward McMorris
Attorneys for Plaintiff
Stephenson Building
Orange, Texas

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Court

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLAUDE J. TOMPLAIT	:	"
VS.	:	CIVIL NO. 5402
FIBREBOARD PAPER PRODUCTS COMPANY	:	

FILED
MAY 16 1969
M ____ 19 ____
James R. Cooney, Clerk, U. S. Court
By Hazel E. Stoddard DEPUTY

PLAINTIFF'S OBJECTION TO COURT'S CHARGE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the plaintiff, after the arguments and submission of the charge to the jury, and objects and excepts to the Court's charge for the grounds in addition to that stated into the record by dictation to the Court reporter, and with the Court's permission, and says that the Court should have submitted the plaintiff's theory of res ipsa loquitur to the jury.

STEPHENSON, THOMPSON AND MORRIS

By Harold W. Thompson
Attorneys for Plaintiff

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

FIBREBOARD PAPER PRODUCTS :
COMPANY :

FILED
MAY 16 1969 19
James R. Cooney, Clerk, U.S. Court
By Hazel E. Studdard DEPUTY

PLAINTIFF'S OBJECTION TO
COURT'S CHARGE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the plaintiff, after the arguments and submission of the charge to the jury, and objects and excepts to the Court's charge for the grounds in addition to that stated into the record by dictation to the court reportar, and with the Court's permission, and says that the Court should have charged the jury that the defendant breached its warranties as set out in plaintiff's complaint.

STEPHENSON, THOMPSON AND MORRIS

By Ward Stephenson
Attorneys for Plaintiff

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Court

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

FIBREBOARD PAPER PRODUCTS COMPANY :

FILED
MAY 16 1969
M ____ 19 ____
James R. Cooney, Clerk, U. S. Court
By Hazel E. Haddad DEPUTY

PLAINTIFF'S REQUESTED CHARGE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the plaintiff after the conclusion of the evidence, before the arguments, and prior to the submission of the case to the jury and requests the Court as follows:

That the Court submit to the jury the plaintiff's theory of res ipsa loquitur.

STEPHENSON, THOMPSON AND MORRIS

By Ward Stephenson
Attorneys for Plaintiff

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

FIBREBOARD PAPER PRODUCTS COMPANY :

FILED
MAY 16 1969 19
M
James R. Cooney, Clerk U. S. Court
By Hazel E. Stubblefield DEPUTY

PLAINTIFF'S REQUESTED CHARGE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the plaintiff after the conclusion of the evidence, before the arguments, and prior to the submission of the case to the jury, and requests the Court as follows:

That the Court charge the jury that the defendant breached its warranties as set out in plaintiff's complaint under the evidence in this case.

STEPHENSON, THOMPSON AND MORRIS

By Ward R. Thomas
Attorneys for Plaintiff

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

FIBREBOARD PAPER PRODUCTS :
COMPANY :

FILED
MAY 16 1969 19
M
James R. Cooney, Clerk, U. S. Court
By Hazel E. Studdard DEPUTY

PLAINTIFF'S REQUESTED CHARGE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the plaintiff after the conclusion of the evidence, before the arguments, and prior to the submission of the case to the jury, and requests the Court as follows:

That the Court charge the jury that the defendant is negligent under the evidence in this case.

STEPHENSON, THOMPSON AND MORRIS

By _____
Attorneys for Plaintiff

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

FIBREBOARD PAPER PRODUCTS COMPANY :

FILED

MAY 16 1969 19 —

James R. Cooney, Clerk U. S. Court

By Hazel E. Studdard DEPUTY

PLAINTIFF'S REQUESTED CHARGE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the plaintiff after the conclusion of the evidence, before the arguments, and prior to the submission of the case to the jury, and requests the Court as follows:

That the Court submit to the jury plaintiff's theory of gross negligence and punitive damages.

STEPHENSON, THOMPSON AND MORRIS

By Ward M. Thomas
Attorneys for Plaintiff

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