T-570—NOTICE OF FILING INTERROGATORIES—Class 2. Gilbert & Cooper, Dallas-Austin-Houston

CLAUDE J. TOMPLAIT vs. THE TRAVELERS INSURANCE COMPANY

No. A -13,916 Suit Pending in 128TH DISTRICT Court of

ORANGE County Texas

To THE TRAVELERS INS. CO. *(Defendant, or ORGAIN, BELL & TUCKER Its Attorney of Record:

Sir: You will take notice that at the expiration of five days from the service hereof I will apply to the Clerk of the 128th District Court in and for Orange County, for a commission to take the depositions of the General Manager of Sabine Insulation Company, Inc.,

who *(is to be found) in the County of Orange, in answer to the accompanying interrogatories, to be read as evidence in behalf of the *(Plaintiff), on the trial of said cause.

STEPHENSON, STEPHENSON & THOMPSON

By: Ward Stephenson

Attorneys for Plaintiff

*Strike out according to facts.

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NO. A-13,916

IN THE 128TH DISTRICT COURT OF ORANGE COUNTY, TEXAS

CLAUDE J. TOMPLAIT	:	
VS.	:	INTERROGATORIES TO BE PROPOUNDED TO GENERAL MANAGER, SABINE INSULATION COMPANY, INC.
THE TRAVELERS INSURANCE COMPANY	:	

No. 1 Please state your full name and address.

No. 2 By whom are you employed and in what capacity?

No. 3 Please state the date that Claude J. Tomplait was employed by your company.

No. 4 Please state the date that the employment of Claude J. Tomplait with your company ended.

No. 5 Please state the exact location where Mr. Tomplait worked for your company. For example, the Bridge City power house of Gulf States Utilities Company.

No. 6 Please state whether or not Claude J. Tomplait was employed by you as an insulator.

No. 7 If Mr. Tomplait was not employed as an insulator, in what capacity was he employed?

No. 8 Please state exactly what types of insulation was used by Mr. Tomplait in his work for your company, giving the manufacturers' name and address.

No. 9 Please give the full description of what this insulation consisted of, such as fiberglas, rock wool, foam glass, thermabestos, etc.

STEPHENSON, STEPHENSON
AND THOMPSON

By Wad Stephenson
Attorneys for Plaintiff
Stephenson Building
Orange, Texas

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