

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY,
ALABAMA

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ROSS-CLAYTON FUNERAL HOME,
INC.

JAN 8 19

Missouri, Alabamas & Tennessee
Mississippi, Means & The Name

Attorneys At Law

CASE NO. CV 84-1521-PR

Y.

GOODWYN & MILLS CONSULTING,
ENGINEERS. et al..

Defendant.

INTERROGATORIES TO PLAINTIFF BY DEFENDANT,
GOODWIN & MILLS CONSULTING ENGINEERS

Comes now the defendant, Goodwyn & Mills Consulting Engineers, and propounds the following interrogatories to plaintiff to be responded to in accordance with the Alabama Rules of Civil Procedure.

1. Please identify yourself fully, giving your full name, residence, business address, occupation and the office you hold with the plaintiff Ross-Clayton Funeral Home, Inc.

2. What is the relationship, if any, between Rufus Lewis and Ross-Clayton Funeral Home, Inc.?

3. Please state the names and addresses of all persons who you questioned about information relevant to this matter.

4. Please describe in detail the business in which your company is engaged.

Feb. 4, 1969 5. When did Ross-Clayton Funeral Home, Inc., acquire the real estate described in plaintiff's complaint, who was it acquired

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MacKinley Lucas
Rasa & Lucas

from, and what was the purchase price? *Dec 30, 1967*

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Layne

6. Describe in detail the damage that you allege to have been done to the real estate of Ross-Clayton Funeral Home, Inc.

7. Explain in detail how you arrived at the damage claim of \$1 million which plaintiff asks for in its complaint.

8. Does the plaintiff or any agent, servant, employee or attorney of the plaintiff have any photographs of the real estate alleged to have been damaged? If so, list the name, address and telephone number of the person having custody of those photographs.

9. Describe the facts upon which you base your allegation that this defendant has wrongfully exercised dominion and control over the plaintiff's real property to the exclusion or defiance of the plaintiff's rights.

10. Did any agent, servant, or employee of the plaintiff ever give Industrial Partners or Goodwyn & Mills Consulting Engineers permission to enter upon its property for any purpose?

11. Please state whether you or anyone acting on behalf of the plaintiff has secured or obtained, or has any knowledge of, any statement in writing made by any person or witness that claims to have any knowledge whatsoever with regard to any statement or conversation made by either of the parties or their respective agents, employees or corporate officers relative to the alleged occurrence. If so, please state (a) the name and address of each such person or witness; (b) the date and time of any such statement or conversation; (c) the date of the recording of any such statement in writing and; (d) the substance or content of any such statement.

12. Please state the name, address and telephone number, and the substance or content of testimony of each witness you expect to call to testify in this case. Additionally, for each expert witness, please supply any and all information relative to his/her qualifications and background.

13. Who is the officer or representative of the plaintiff who has the most knowledge of the allegations contained in plaintiff's complaint?

RUSHTON, STAKELY,
JOHNSTON & GARRETT, P.A.

BY:


RONALD G. DAVENPORT
Attorney for Defendant
P. O. Box 270
Montgomery, AL 36195
(205) 834-8480

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the above and foregoing Interrogatories to Plaintiff by Defendant, Goodwyn & Mills Consulting Engineers upon Tyrone C. Means, Esquire, P. O. Box 5058, Montgomery, AL 36101, by placing a true copy of same in the United States mail, postage prepaid, and addressed to him at his regular mailing address.

This 7th day of January, 1985.


Ronald G. Davenport
OF COUNSEL