

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

TONY WEBSTER and)
VICKEY WEBSTER ,)
)
Plaintiffs,)
)
v.)
)
UNITED VAN LINES, LLC,)
)
and)
)
HUTCHCRAFT VAN SERVICE, INC.,)
)
and)
)
MICHAEL T. WATSON,)
Serve: 4710 80th St. North)
St. Petersburg, FL 33709)
)
Defendants.)

Case No. _____
Division: _____

PLAINTIFFS' FIRST INTERROGATORIES TO DEFENDANT MICHAEL T. WATSON

Pursuant to Mo. R. Civ. P. 57.01, plaintiffs propound the following interrogatories to defendant Michael T. Watson, to be answered separately and fully in writing, under oath, as required by law within forty-five (45) days after service of these interrogatories along with a copy of the petition filed in this matter. These interrogatories are continuing in nature and the answers shall be supplemented by the defendant at any time in the future as the facts and information discovered hereafter shall have been ascertained. Said supplemental answers shall be served upon counsel for the plaintiffs reasonably after such discovery is made.

NAME

1. State your full name, date of birth and place of birth:
Name: _____
Date of Birth: _____

Place of Birth: _____

Operator's/Chauffeur's License Number: _____

Issuing State: _____

RESIDENCE

2. State your present residence address and the period during which you have resided at said address:

Present Address: _____

From _____ to the present date.

MARRIAGE

3. Are you married at the present time? () Yes () No

If "Yes", state:

(a) Your spouse's first name and maiden name: _____

CRIMES OR IMPRISONMENT

4. Have you ever pleaded guilty to or been convicted of a felony or misdemeanor? (This does not include municipal court convictions) () Yes () No

If your answer is "Yes", state:

(a) The nature of the offense: _____

(b) The date and court: _____

AGENCY

5. Were you at the time of the occurrence or occurrences forming the basis of this suit performing any job, task or undertaking for any person, firm or corporation other than yourself? () Yes () No

If your answer is "Yes", state:

- (a) The name and address of the person, firm or corporation for whom you were performing some job, task, or undertaking:

- (b) The nature of the job, task, or undertaking you were performing for such person, firm or corporation:

- (c) Whether or not you were at such time employed by or on the payroll of such person, firm or corporation:

- (d) Whether or not you were receiving any compensation from such other person, firm or corporation for the performance of the said job, task or undertaking:

DATE AND TIME

6. State the date and time of occurrence of the incident mentioned in plaintiffs' petition:

PLACE

7. State the exact location of the occurrence mentioned in plaintiffs' petition, giving the name of the street or streets, road, alley or highway on which it occurred or the distances from other identifiable landmarks or points of reference:

DISABILITY

8. Were you suffering from any physical disability or impairment at the time of the occurrence mentioned in plaintiffs' petition? () Yes () No

If your answer is "Yes", explain:

STATEMENTS

9. Attach a copy of any recital or statement that you have from plaintiffs, whether it be in writing, reduced to writing, steno type, recorded or otherwise. In the case of a court reporter's transcript, plaintiff must advance fifty percent (50%) of the cost of the same.

Do you have a statement: () Yes () No

Attached: () Yes () No

10. Please state what, if anything, plaintiffs said to you or any other persons in your presence about the occurrence mentioned in plaintiffs' petition concerning how the occurrence happened and what injuries plaintiffs suffered:

WITNESSES

11. State the name and present or last known addresses and employment of all persons known to you or reported to you, your agents, attorneys, or other acting on your behalf.

(a) To have witnessed the occurrence mentioned in the pleadings:

Name

Address and Employment

<hr/>	<hr/>
<hr/>	<hr/>

- (b) To have been present at the scene of the occurrence within thirty (30) minutes thereafter:

Name	Address and Employment
_____	_____
_____	_____

- (c) If any of the above witnesses are an acquaintance or relative, please indicate:

PHOTOGRAPHS

12. State whether any photographs were made at the scene of the occurrence, or of any vehicles involved by anyone other than you, your attorney or agent in anticipation or preparation for litigation. () Yes () No

If your answer is "Yes", give the following:

Date Taken	Name of Photographer	Address of Photographer
_____	_____	_____
_____	_____	_____
_____	_____	_____

ALCOHOL OR DRUGS

13. Did you consume any alcoholic beverage of any type, or any sedative, tranquilizer or other drug, medicine or pill during the twelve (12) hours immediately preceding the occurrence referred to in the Petition? () Yes () No

INSURANCE

14. Do you have any insurance agreements which will indemnify you, in whole, or in part, against any judgment plaintiffs may obtain in the instant action? () Yes () No

If your answer is "Yes", state:

- (a) The name and address of the company or companies issuing such insurance agreements:

- (b) The policy number:_____

- (c) The limits of Personal Injury, Property Damage and Medical Payments Coverage on the date of the occurrence mentioned in plaintiffs' petition:

- (d) Attach a copy of the Declaration Page or Certificate of Coverage of such policy of insurance to your answer to these interrogatories.

15. Have any photographs, videotapes or motion pictures of plaintiffs or plaintiffs' decedent been taken by you or anyone acting on your behalf? If your answer is "yes," please state for each:

- (a) The date or dates each photograph, videotape or motion picture was taken;
- (b) The name, address and job capacity of each person taking any such photograph, videotape or motion picture;
- (c) The location where each photograph, videotape, or motion picture was taken; and
- (d) The present custodian(s) of the negatives of photographs and the original videotape or motion picture.

ANSWER:

16. As to each and every person whom you expect to call as an expert witness at trial, please state the following:

- (a) Full name and address, including street, city, state and zip code;
- (b) Occupation;
- (c) Place of employment;
- (d) Qualifications to give an opinion, or if such is available on the expert's curriculum vitae, such curriculum vitae may be attached to these interrogatory answers;

- (e) The general nature of the subject matter on which the expert is expected to testify; and
- (f) The expert's hourly deposition fee.

ANSWER:

17. State the name, address and telephone number of all your previous employers from 1992 to the present, including dates of employment, reason that the employment ceased, and the name of your direct supervisor for each such position.

ANSWER:

18. As it relates to the trip defendant Michael T. Watson was on at the time of the incident described in plaintiffs' Petition, state:
- a. The address of the location from which defendant Michael T. Watson departed at the beginning of the trip in question;
 - b. The date and exact time defendant Michael T. Watson departed this address on the trip in question;
 - c. The name and proper description for each road and highway traveled by defendant Michael T. Watson on the trip in question prior to the incident that is the subject matter of plaintiffs' Petition ;

- d. The name of each and every city or location in which defendant Michael T. Watson purchased fuel on the trip in question, including the time of each purchase; and
- e. The name, address and telephone number of each person by whom defendant Michael T. Watson was dispatched on the trip in question.

ANSWER:

HENNING & BOUGH, P.C.

By _____
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ATTORNEYS FOR PLAINTIFFS

Signature of this document certifies that a copy was served to the persons named below on the date and in the manner indicated:

Person Served	Party	Date	Method
Bob Horn Horn Aylward & Bandy, LLC 2600 Grand Blvd., Suite 500 Kansas City, MO 64108 (816) 421-0700 phone (816) 421-0899 fax	Defendants United & Hutchcraft	8/14/03	U.S. Mail

