

GREGG R. PARKER, ET AL § IN THE 112TH JUDICIAL
 §
 VS. § DISTRICT COURT OF
 §
 REMINGTON ARMS CO., INC., § SUTTON COUNTY, TEXAS
 ET AL

DEFENDANT, REMINGTON ARMS CO., INC.'S
 FIRST INTERROGATORIES TO PLAINTIFF,
GREGG R. PARKER

TO: GREGG R. PARKER, Plaintiff, and his attorney, JEFFREY C.
 ANDERSON, Southers, Goldberg & Lyons, Inc., 126 Villita
 Street, San Antonio, Texas 78205.

Please take notice that pursuant to Rule 168, Texas Rules of Civil Procedure, the following Interrogatories are submitted to be answered by you. Such answers shall be signed and sworn to and shall be served on the undersigned within thirty (30) days of the date these Interrogatories are served on your attorney of record. The Interrogatories you are requested to answer are as follows:

1. State your name, birth date, present address, social security number, and driver's license number.

Gregg Ray Parker, January 9, 1959, 300
~~126 Villita Street, San Antonio, Texas 78205~~

2. Have you ever been known by any other name? If so, please state each such name or names.

None

3. Please state where you were born and each address where you have resided for the last five (5) years. If you are unable to recall any exact address, please state the name of the street, if possible, and the town and state.

Olmito, Texas Box 462 Olmito, Texas,
~~200 Cottonwood Street~~

4. Are you presently married? If so, give your spouse's given name and the names and ages of your children, if any.

None

5. If you have answered the foregoing Interrogatory in the affirmative, please state whether your spouse and/or children are in good health. If not, please state who is not in good health and the reason for such poor health.

N/A

6. Is anyone living with you at the present time besides your spouse and children? If so, what is the relationship of that person or those persons to you?

Yes, College commutes One in my brother.

7. Have you ever been divorced? If so, please state:

No.

(a) The approximate date or dates when such divorce or divorces were obtained;

(b) Where such divorce or divorces were obtained;

(c) The present names and addresses of any previous spouses.

8. Please list each school or college you have attended, the number of years you attended each such school and/or college, and any degrees or certificates of graduation or completion awarded to you.

Seneca High School - 12 yrs. Baylor University
17 1/2 yrs.

9. Please state specifically the nature of the injuries you received in the occurrence made the basis of this lawsuit.

Received gunshot wounds to my right leg and lower abdominal area. As a result I had to have physical therapy, and as a result required necessary medical expenses, I also suffered physical impairment.

10. Have you recovered from such injuries? If not, what complaints do you still have?

Yes, at present time

11. If you have been hospitalized since the date of the occurrence made the basis of this lawsuit, for any reason, please state as to each hospitalization:

(a) Name and address of the hospital, clinic, sanitarium, nursing home or other institution.

N/A

(b) Date of admission and date of discharge;

N/A

(c) The name and address of the physician or other practitioner of the healing arts who admitted you to the hospital;

N/A

(d) The total hospital charges; and

N/A

(e) The reason for admittance.

N/A

12. If you have seen any physicians or others practicing the healing arts since the date of the occurrence, for any reason, please state as to each:

(a) The name and address of each;

Dr. Charles F. Berman - Sonoma, Texas

(b) How many times and when you saw each;

Berman - once

(c) The date when you last saw each;

December 77

(d) What each has charged you on each occasion;

none

(e) Each diagnosis; and

Physician prescribed certain pills to lessen the pain.

(f) The reason you saw each.

Pain in my stomach and a lump
in my leg.

13. If you have at any time prior to the occurrence in question received medical attention for any injury or illness, please give the following information:

(a) A full description of each such injury or illness;

N/A.

(b) The dates of each injury or illness;

N/A.

(c) The name and address of each physician or other practitioner of the healing arts administering treatment for such injury or illness; and

NONE

(d) The name and address of each hospital, clinic, sanitarium, nursing home, or other institution in which you were hospitalized for such injury or illness.

NONE

14. Have you ever served in any branch of military service? If your answer is in the affirmative, please furnish the following information:

No.

(a) Your final rank at time of discharge or retirement and the branch of service to which you were attached;

No

(b) The type of discharge received; and

NONE

(c) If you have ever received any type of service-related disability, state the nature or reason for such disability, the percentage of disability assigned, and the dates you were eligible for such disability.

NONE

15. With reference to your work history prior to and at the time of the occurrence in question, please furnish the following information:

(a) The name and address of each employer for whom you have worked (if self-employed so state);

Annis Parker Box 462 Iron, Texas

(b) The years or approximate period of time that you worked for each employer, and the details concerning the reason that each such employment was terminated (if self-employed, state the periods of time that you were self-employed and the details concerning the reason for terminating such employment);

Jamie Parker - worked on the road from
7:30 am to 4:00 pm as full graduation of high school
and a date school work fall.

(c) The name of your immediate supervisor while working for each employer;

Jamie Parker

(d) Your salary per hour for each employment and your average weekly wage for each employment (if self-employed, state the total amount of income derived from each period of self-employment and your average weekly income therefrom);

250 per month

(e) The nature of your employment for each employer and duties that you performed (if self-employed, the nature of such employment and the duties that you performed); and

worked on the road for

(f) Whether any complaints were made to you regarding the manner in which you performed your job; if so, describe in detail.

NONE

16. With reference to your work history since the date of the occurrence in question, please furnish the following information:

(a) The name and address of each employer for whom you have worked (if self-employed so state);

Billy Dean, 1212 1/2 Ave - 1212 1/2 Ave
Hazen Trucking Company, Hazen

(b) The years or approximate period of time that you have worked for each employer, and the details concerning the reason that each such employment was terminated (if self-employed, state the periods of time that you were self-employed and the details concerning the reason for terminating such employment);

Billy Adams - One Year - Went to School
Harold Buckley - One Summer - Went to School

(c) The name of your immediate supervisor while working for each employer;

Billy Adams
Don Harper

(d) Your salary per hour for each employment and your average weekly wage for each employment (if self-employed, state the total amount of income derived from each period of self-employment and your average weekly income therefrom);

Billy Adams - 3 dollars per hour
Don Harper - 3.50 per hour

(e) The nature of your employment for each employer and duties that you performed (if self-employed, the nature of such employment and the duties that you performed); and

Billy Adams - fixed wood mill and water pump
Don Harper - fixed all logs

(f) Whether any complaints have been made to you regarding the manner in which you performed your job; if so, describe in detail.

17. Have you missed any time from work as a result of the occurrence made the basis of this lawsuit? If so, please state the following:

NONE

(a) How much time you have lost from work and whether there were any deductions from your pay as a result of such loss of time; and

NONE

(b) How much in wages or income, if any, you have lost as a result of the occurrence made the basis of this lawsuit.

NONE

18. What other expenses and/or monetary losses have you had because of the occurrence made the basis of this lawsuit? Explain each in detail.

Was not able to participate in half of basketball season.

19. Please set forth verbatim the substance and content of all medical reports received by you or your attorney regarding your physical condition since the occurrence made the basis of this lawsuit; or if you prefer, please attach copies of such reports to your answers to these Interrogatories.

NONE

20. Have you ever been arrested? If so, state the date and place of each arrest, the reason for each arrest, and the final disposition of each.

No.

21. Have you ever made any claim for damages or injuries received in any accident or occurrence other than the claim asserted in this lawsuit? If your answer is "yes," then please state the following:

No.

(a) The date of each accident or occurrence giving rise to the claim;

November 21, 1976

(b) The name and address of the party against whom the claim was made;

Remington Arms Company

(c) A brief description of the manner in which the accident occurred;

A Remington gun discharged when moved to fire. Went through a wall striking me in the leg and stomach.

(d) A description of the injuries received or claimed in such accidents or occurrences;

Several leg wounds to the right leg and one to the stomach.

(e) The names and addresses of all doctors examining or treating you for such injuries;

Charles F. Brown - San Antonio
Dr. Eckhart - San Angelo

(f) The cause number, style, court, county, and state of each lawsuit filed as a result of such claim; and

Cause No 22981 112th Dist Ct of Sutter County, Grigg & Baker
and Court Annex before vs Remington Arms Company, Inc. et al

(g) The final disposition of each claim.

Pending

22. Please state the names and addresses of any and all persons, including experts, having knowledge of facts relevant to the issues of this lawsuit.

The Parker Family - San Antonio, Texas Box 162
Dr. Charles F. Brown - San Antonio, Texas
Dr. Eckhart - San Angelo
The Van Sled Family - San Antonio
Jeffrey Cochran - San Antonio
James T. Clark - San Antonio
Miss Mary K. Baker - 15 San Manuel Square, City of San Antonio
Miss Louisa Bright - 15 San Manuel Square, City of San Antonio
Miss Mildred Bright - 15 San Manuel Square, City of San Antonio

23. Please state the name and address of each person whom you expect to call as an expert witness at the trial of this cause and state in detail the subject matter by which the expert is expected to testify.

under protest

24. If you will do so without Motion to Produce, please attach a true and correct copy of any and all reports of the experts mentioned in the preceding Interrogatory, including factual observations and opinions, and all photographs that accompany, are included in, or are referred to in said reports.

None

25. Do you have any photographs that are material evidence or that constitute or contain or are reasonably calculated to lead to the discovery of material evidence?

Yes

26. If your answer to the foregoing Interrogatory is in the affirmative, will you agree, without the necessity of a Motion to Produce, to produce and permit the inspection and copying of all photographs that are material evidence or that constitute or contain or are reasonably calculated to lead to the discovery of material evidence?

YES

27. In connection with the occurrence made the basis of this lawsuit, state the name and current address of Craig Parker, this Plaintiff's brother.

*Craig Carl Parker
300 Cottonwood #309
Waco, Texas 76706*

28. Describe in detail your version of the occurrence made the basis of this lawsuit.

My father and I had been out hunting the afternoon before and were left two gas cans which he thought he would be using at home in the morning when we got home. When I checked it was empty and I had to go to the gas station. At this time I was in the company room connected by a walk-through bathroom. Craig did not see the fuel can, moved the 15 liter tank to the station and the gas tank. I was at the time starting to walk through the bathroom. The fuel tank went through the walk-through, striking me and my mother.

29. Have you filed any income tax returns with the Internal Revenue Service for the past five years, and if so, state each year for which you have so filed.

None

30. If your answer to the foregoing Interrogatory is in the affirmative, will you agree, without the necessity of a Motion to Produce, to produce and permit the inspection and copying of all income tax returns, including W-2 forms and all other forms showing income other than wages, that you have filed for the past five years?

N/A

31. Will you agree to supplement your answers to these Interrogatories at such time as later information may be acquired by you or your attorney without the necessity of obtaining an order of the court compelling you to do so?

YES

DATED this 9th day of January, 1979.

KLEBERG & WEIL
1200 Corpus Christi National
Bank Building
Corpus Christi, Texas 78401

Telephone: (512)884-3551

By: J. Robert McKissick
J. Robert McKissick

ATTORNEYS FOR DEFENDANT,
REMINGTON ARMS CO., INC.

Augg Parker

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Interrogatories was served on Plaintiff and on Defendants by depositing same with the United States Postal Service, postage prepaid, United States Certified Mail, Return Receipt Requested, addressed to their attorneys of record, on this the 9th day of January, 1979.

J. Robert McKissick
J. Robert McKissick