

NO. 2,298

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.

No.

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,
San Antonio, Texas

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

No.

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?

No, College commutes One in my father.

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. Bowler University
1982-1984

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 abdomen area. As a result I spent
several months in hospital and required medical
attention. I also suffered physical disfigurement.

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. Burren - Sonoma, Texas

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

Burren - 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);

James 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 forest area
7 years - lay off after graduation of high school
but to go to school work full.*

(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 forest area.

(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 Allen, 12345 Main St, Seattle, WA
Hansen Printing Company, Seattle*

(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 Allen - 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 Allen
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 Allen - 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 Allen - fixed wire mill and water pump
Don Harper - fixed oil pump

(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. Blum - Sonoma
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 2 of Sutton County Griggs & Barker
And Court Annex Barker 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 Poppe Family - Sonoma, Texas Box 162
Dr. Charles F. Blum - Sonoma, Texas
Dr. Eckhart - San Angelo
The Jim Scott Family - San Antonio
Jeffrey Cochran - San Antonio
T. C. Chas - San Antonio
Miss Mary Perkins - 15, San Miguel de Guadalupe, Chihuahua
Miss Louisa Bright - El Paso, Texas
Calvin Hall Box 1643 Sonoma, Texas

Under present

[illegible] N_{+2}

Yes

YES

Craig Coil Parker
300 Cottonwood #204
Waco, Texas 76706

My father and I had been out hunting like intended
I was told early left too you would believe he
thought he would be away at once in the morning but
when we got home, Chris told us it was not at
last to be made the way. At this time, being in the
spring, I was accompanied by a bunch of cattle (bottles).
They did not have had any more of the bottles the
off season and the year had been at the time
of getting in with the high of bottles. The latter
went through the winter and the year, looking for
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

ATTORNEYS FOR DEFENDANT,
REMINGTON ARMS CO., INC.

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