

FORM OF PROPOSED INTERROGATORIES

IN THE CITY COURT OF SAVANNAH

VS.

SUIT FOR DAMAGES

D. CLARK ABBOTT, and
J. MERRELLE MOCK, copartners,
trading as A & M WRECKING AND
PARTS COMPANY

INTERROGATORIES TO BE PROPOUNDED TO
_____, OF CINCINNATI, OHIO,
A MATERIAL WITNESS FOR THE DEFENDANT IN THE ABOVE CASE,
WHO RESIDES WITHOUT THE STATE OF GEORGIA, AND IN THE
CITY OF CINCINNATI, OHIO, AND WHOSE ADDRESS IS UNIVERSITY
OF CINCINNATI, CINCINNATI, OHIO.

FIRST INTERROGATORY:

Please state your name, age, and place of residence.

SECOND INTERROGATORY:

What is your profession? What college or colleges did you
graduate from? What hospitals have you been connected with? In what
profession do you specialize?

THIRD INTERROGATORY:

On or about July 6th, 1937 did you analyze a specimen
of blood and urine of _____ as sent you by Dr. J. K. Train
of Savannah, Georgia? If you did, please state what results you found
with regard to lead poisoning; what evidence of lead were found in
the blood and urine?

FOURTH INTERROGATORY:

If you state you found some evidence of lead, will you
please state whether or not the amount so found was within the limits
of the lead content usually found in normal individuals?

FIFTH INTERROGATORY:

Have you in your profession examined ^{other} specimens of blood
and urine of persons to determine if they contained evidence of lead.
If you answer yes, ^{state} during what period these examinations were made. About
how many examinations have you made with a view of determining the lead
content of specimens of blood and urine submitted by persons?

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SIXTH INTERROGATORY:

What evidence of lead is generally found in persons residing in urban communities?

SEVENTH INTERROGATORY:

Is a person more apt to absorb lead into his system by absorption through the skin from handling gasoline or by retention in the lungs through breathing air containing spent gas from automobile exhausts?

EIGHTH INTERROGATORY:

Please state whether or not in your opinion, based on your experience and medical knowledge, whether lead content you found in the blood and urine of [REDACTED] was sufficient evidence of ^{such} lead poisoning ~~such~~ as would cause him to suffer paralysis of the wrists which is known as "wrist drop" and paralysis of the ankles which is known as ^{show the following symptoms:} "ankle drop"; the muscles of plaintiff's legs, ankles and feet ~~have~~ wasted and become flacid and weak; he has lost, almost totally, the use and control of his ankles and feet; he can walk only haltingly and with great difficulty; the muscles of plaintiff's arms, wrists and hands have wasted and become flacid and weak; he has lost, almost totally the use of his wrists and hands; the muscles of his hands and fingers, on the under side or palm side of his hands and fingers, are drawn so that his fingers are held in a claw-like half-closed position; and..... suffers disturbances of his nervous system, impaired digestion, poor nutrition, anaemia and weakness.

ATTORNEYS FOR DEFENDANT

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