

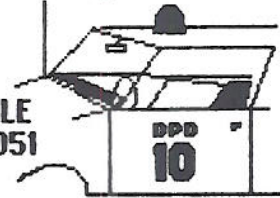


**TENTH AND PATTON
INVESTIGATIONS**



"Searching for tips on Tippit"

**DAYE PERRY
4601 AINSWORTH CIRCLE
GRAPEVINE, TEXAS 76051
(817) 488-1531**



FILED
TIME.....
MAR 29 1972
BILL SHAW
DIST. CLERK, DALLAS CO., TEXAS
M. L. Duran DEPUTY

NO. 71-12361-A

GENEVA WHITE, INDIVIDUALLY AS
INDEPENDENT EXECUTRIX OF THE
ESTATE OF ROSCOE A. WHITE,
DECEASED, AND AS NEXT FRIEND OF)
ROSCOE A. WHITE, JR., AND RICKY)
DON WHITE, MINORS, PLAINTIFFS) IN THE DISTRICT COURT
VS.) OF DALLAS COUNTY, TEXAS
ARROW CHEMICAL CORPORATION,)
DEFENDANT) 14TH JUDICIAL DISTRICT

NON-SUIT

TO THE HONORABLE JUDGE OF SAID COURT:

This 29 day of March, 1972, came GENEVA WHITE,
individually as Independent Executrix of the Estate of
Roscoe A. White, deceased, and as next friend of Roscoe A.
White, Jr. and Ricky Don White, minors, and in this suit
wherein the foregoing parties are plaintiffs and Arrow
Chemical Corporation is defendant, hereby takes a
voluntary non-suit as plaintiffs therein and respectfully
asks the court to enter its order dismissing said suit at
plaintiff's costs.

Respectfully submitted,

Geneva White
GENEVA WHITE, Individually as
Independent Executrix of the
Estate of Roscoe A. White, dec'd.,
and as next friend of Roscoe A.
White, Jr., and Ricky Don White,
Minors.

A-17/393

ORDER

On this 29 day of March, 1972, came the Plaintiff
Geneva White, individually as Independent Executrix of the
Estate of Roscoe A. White, deceased, and as next friend of
Roscoe A. White, Jr., and Ricky Don White, minors, and
wherein Arrow Chemical Corporation is the defendant; and
plaintiff saying she wants a voluntary dismissal of her
suit; it is therefore ORDERED, ADJUDGED and DECREED by this
court that this cause be and it is hereby dismissed at
Plaintiff's costs, for which let execution issue.

Dean A. White
JUDGE 14TH DISTRICT COURT

LAMAR HOLLEY
MERLE R. FLAGG
WILLIAM M. HAYNER
JAMES H. MILLER

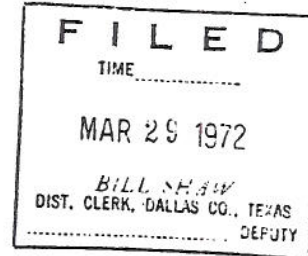
JAMES H. McMENAMY

HOLLEY, FLAGG, HAYNER & MILLER

ATTORNEYS AND COUNSELORS AT LAW
1818 REPUBLIC NATIONAL BANK BUILDING
DALLAS, TEXAS 75201

AREA CODE 214
RI 2-1971

March 28, 1972



Hon. Fred Harless, Judge
14th Judicial District Court
County Courthouse Bldg.
Dallas, Texas

Re: Cause No. 71-12361-A
White vs. Arrow Chemical

Dear Judge Harless:

I enclose the original Non-Suit signed by Mrs. Geneva White in the above case, who asks me to forward this to your attention. Also there is an Order for the court.

If in order, please sign said Order and have your clerk forward to us in the stamped, self-addressed envelope the copy.

Good luck in your campaign.

Sincerely,


Lamar Holley

CC: Mr. Harvey Lewis
CC: Mr. Tony Dirksmeyer
CC: Mrs. Geneva White

CAUSE NUMBER 71-12361-A

FILED
MAY 11 1971
DALLAS, TEXAS
D. J. [Signature]

GENEVA WHITE, INDIVIDUALLY AS INDEPENDENT EXECUTRIX OF THE ESTATE OF ROSCOE A. WHITE, DECEASED, AND AS NEXT FRIEND OF ROSCOE A. WHITE, JR., AND RICKY DON WHITE, MINORS, Plaintiffs

IN THE DISTRICT COURT OF

VS.

DALLAS COUNTY, TEXAS

ARROW CHEMICAL CORPORATION, Defendant

14TH JUDICIAL DISTRICT

NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

TO: GENEVA WHITE, Individually and As Independent Executrix of the Estate of Roscoe A. White, Deceased, And as Next Friend of Roscoe A. White, Jr. and Ricky Don White, Minors, Plaintiffs by serving their attorney of record, J. HARVEY LEWIS, 104 Merchants State Bank Building, Ross Avenue & Henderson Streets, Dallas, Texas 75206, and to Fidelity & Casualty Company, Inter-venors, by serving their attorney of record, Lamar Holley, 1818 Republic National Bank Building, Dallas, Texas 75201.

You will take notice that after ten (10) days from the service of a copy hereof with attached Questions, a deposition by written interrogatories will be taken of the fire investigation records of the Dallas Fire Department, the custodian of such records being J. E. TUMA or E. A. EMERSON. The witnesses can be located at 2111 Main Street, Dallas, Texas. The deposition by written interrogatories will be taken before Helen Laidrich, a Court Reporter and Notary Public In and For Dallas County, Texas, whose address is Post Office Box 95, Irving, Texas 75060.

Such deposition with attached Questions may be used in evidence upon the trial of the above styled and numbered cause, pending in the above named Court.


Notice is further given that request is here made as authorized under Rule 201, Texas Rules of Civil Procedure, to the officer authorized to take this deposition to issue a Subpoena Duces Tecum and cause it to be served on the witnesses to produce the records and reports of the Dallas Fire Department concerning a fire which occurred on or about September 23, 1971, at the premises of M & M Equipment Company, located at 10625 Ferguson Road, Dallas, Texas, and to produce the records and reports made by or on behalf of the Dallas Fire Department concerning the fire which occurred at M & M Equipment Company located at 10625 Ferguson Road, Dallas, Texas on or about September 23, 1971, and to turn all such records and reports over to the officer authorized

to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

Respectfully submitted

DIRKMEYER AND WAGNER

BY


TONY DIRKMEYER
Attorney For Defendant
7700 Carpenter Freeway
Dallas, Texas 75247
Phone: 214/638-8830

I certify that a true and exact copy of the foregoing Notice of Intention to Take Deposition By Written Questions along with a true and correct copy of such questions was mailed to the respective parties or their attorneys of record by Certified Mail, Return Receipt Requested, on the 27 day of March, 1972.


TONY DIRKMEYER



FOURTEENTH DISTRICT COURT
DALLAS, TEXAS 75202

March 17, 1972

CHAMBERS OF
JUDGE FRED S. MARLESS

Mr. J. Harvey Lewis
104 Merchants State Bank Bldg.
Dallas, Texas 75206

Mr. Tony Dirksmeyer
7700 Carpenter Freeway
Dallas, Texas 75247

Mrs. Geneva White
P. O. Box 4071
Richardson, Texas 75080

Mr. Lamar Kolley
1015 Republic Bank Bldg.
Dallas, Texas 75201

In Re: No. 71-12361-A
White vs. Arrow

Gentlemen:

Please take notice of the setting of this cause
for trial on the merits on August 14, 1972

Announcement should be made before 10:30 a.m. to
the Court on the Friday preceding the setting, subject
to the provisions of Article 1.17 of our Dallas Court
Rules.

Attention of all parties is directed to Article
1.10 regarding filing of exceptions.

jury has been demanded.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Fred S. Marless".

Judge

ASSOCIATES
MARVIN KRAMER
S. BRYAN MOORE, JR.

J. HARVEY LEWIS
ATTORNEY AT LAW
104 MERCHANTS STATE BANK BUILDING
ROSS AVENUE AT HENDERSON ST.
DALLAS, TEXAS 75206

FILED
FEB 23 11 24 AM '72
PHONE 821-0113
AREA CODE 214
SHAH
DIST. CLERK
DALLAS CO. TEXAS
DEPUTY

February 22, 1972

Mrs. Martha Johnston, Clerk
14th District Court
Dallas County Government Center
Dallas, Texas 75202

Mrs. Geneva White
P.O. Box 4071
Richardson, Tex
75080

Re: No. 71-12361-A
Geneva White, et al vs.
Arrow Chemical Corporation

Dear Mrs. Johnston:

I am enclosing my check No. 2284 in the amount of \$5.00, and asking that you place the above case on the Jury Docket on behalf of Fidelity and Casualty Company of New York.

Also, please place this case in line for trial on the merits at the earliest possible date.

By copy of this letter I am advising the opposing counsel of this action.

Thank you very much for your cooperation.

Sincerely yours,

J. Harvey Lewis
J. Harvey Lewis

JHL:erg
Encls.

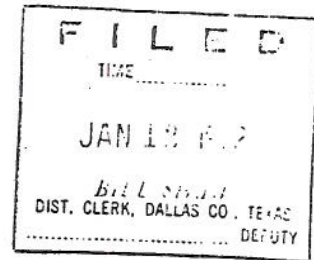
cc: Mr. Lamar Holley
1818 Republic National Bank Bldg.
Dallas, Texas 75201

Mr. Tony Dirksmeyer
Attorney at Law
7700 John W. Carpenter Fwy.
Dallas, Texas

Mr. Jep Carr

3-14-72
copy -
set for trial -
notify Mrs. Geneva
White (P.O.) of
setting -
FSA

January 11, 1972



Mr. Harvey Lewis, Attorney
Merchant's State Bank Bldg.
Dallas, Texas

Re: No. 71-12361, Geneva White, Individually
as Independent Executrix of the Estate of
Roscoe A. White, Deceased, and as Next
Friend of Roscoe A. White, Jr. and Ricky
Don White, Minors, Plaintiff vs. Arrow
Chemical Corporation, Defendant

Dear Sir:

I have been to Mr. Lamar Holley's office and was surprised to learn that you told him you were still on the case against Arrow Chemical Company.

Mr. Lewis, you do not represent me in any matter any more and this is true from December 21, 1971.

I recognize that you represent Mr. Rasmussen, with whom I have a conflict; Fidelity and Casualty Company, with whom I may have a conflict; and Mr. Adair, with whom I have a conflict.

I recognize that I owe you for the probate of my deceased husband's will and some services prior to December 21, and ask you to send the bill to Mr. Holley's office.

I am filing a new suit against Arrow Chemical so will ask the court to dismiss the present case.

I feel that your contingent fee contract is voidable because of the aforesaid conflict of interest.

Very truly yours,

Geneva White



CC: Clerk
14th District Court
Dallas County Courthouse
Dallas, Texas

FILED

72 FEB 16 AM 10:40

NO. 71-12361-A

GENEVA WHITE, INDIVIDUALLY AS
INDEPENDENT EXECUTRIX OF THE ESTATE
OF ROSCOE A. WHITE, DECEASED, AND
AS NEXT FRIEND OF ROSCOE A. WHITE,
JR., AND RICKY DON WHITE, MINORS,
Plaintiffs

I IN THE DISTRICT COURT OF

M. D. ...

I DALLAS COUNTY, TEXAS

VS.

ARROW CHEMICAL CORPORATION,
Defendant

I 14TH JUDICIAL DISTRICT

INTERVENTION OF FIDELITY AND CASUALTY COMPANY OF NEW YORK

TO THE HONORABLE JUDGE OF SAID COURT:

Fidelity and Casualty Company of New York, with leave of Court obtained, files this Petition in Intervention against Arrow Chemical Corporation, and represents:

1. Intervenor adopts the allegations contained in paragraphs 1, 2, 3 and 4 of Plaintiff's Original Petition filed herein by Geneva White, Individually and as Independent Executrix of the Estate of Roscoe A. White, Deceased, and as Next Friend of Roscoe A. White, Jr., and Ricky Don White, Minors, Plaintiffs.

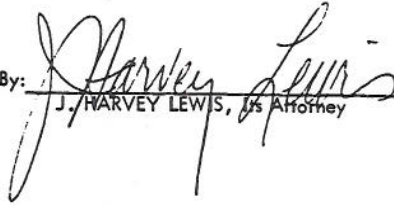
2. Intervenor alleges that the damages sustained by Plaintiffs in this proceeding aggregate in excess of Intervenor's subrogated claim against the Defendant by reason of liability incurred by Intervenor pursuant to its policy of Workmen's Compensation Insurance covering the deceased, Roscoe A. White, whose death giving rise to such liability was caused by the acts of negligence of the Defendant as alleged in Paragraph 4 of Plaintiff's Petition.

3. The extent of Intervenor's Workmen's Compensation liability arising out of the death of Roscoe A. White proximately caused by the negligence of the Defendant as above alleged, is not known at the time of this pleading, but at the present time exceeds the amount of \$1,000.00, being the minimum jurisdictional amount of this Court, and will, in all probability, ultimately exceed the amount of \$20,000.00.

INTERVENOR PRAYS that the Defendant, Arrow Chemical Corporation, be cited to answer this Petition in Intervention and upon final hearing, Intervenor have judgment against Arrow

Chemical Corporation for the amount of its damages as shown at the time of trial, costs of suit, and such other and further relief to which Intervenor is entitled.

FIDELITY AND CASUALTY COMPANY OF
NEW YORK, Intervenor

By: 
J. HARVEY LEWIS, Its Attorney

J. HARVEY LEWIS
104 Merchants State Bank Bldg.
Ross Avenue @ Henderson Street
Dallas, Texas 75206
821-0113

FILED

'72 FEB 16 AM 10:40

NO. 71-12361-A

Fidelity

GENEVA WHITE, INDIVIDUALLY AS INDEPENDENT EXECUTRIX OF THE ESTATE OF ROSCOE A. WHITE, DECEASED, AND AS NEXT FRIEND OF ROSCOE A. WHITE, JR., AND RICKY DON WHITE, MINORS, Plaintiffs	I I I I I I	IN THE DISTRICT COURT OF DALLAS COUNTY, TEXAS
VS.	I	
ARROW CHEMICAL CORPORATION, Defendant	I I	14TH JUDICIAL DISTRICT

PETITION FOR LEAVE TO INTERVENE

Fidelity and Casualty Company of New York Petitioners the Court for leave to file its
Petition in Intervention concerning its subrogated claim against the Defendant, Arrow
Chemical Corporation, attached herewith.

FIDELITY AND CASUALTY COMPANY
OF NEW YORK

J. HARVEY LEWIS
104 Merchants State Bank Bldg.
Dallas, Texas 75206

By: *J. Harvey Lewis*
J. HARVEY LEWIS, its Attorney

A-17/134

ORDER GRANTING LEAVE TO INTERVENE

The above Petition for Leave to Intervene, filed by Fidelity and Casualty Company of
New York, having been presented to me and it appearing that the same should be granted,
it is:

ORDERED that Fidelity and Casualty Company of New York, be, and it is hereby
granted Leave to Intervene in this proceeding by filing in this cause its Petition in Intervention
attached to its Application.

ENTERED this 16 day of February, A. D., 1972.

Dean S. Stiles
JUDGE

FILED

FEB 8 8 35 AM '72

CAUSE NUMBER 71-12361-A

GENEVA WHITE, INDIVIDUALLY AS INDEPENDENT EXECUTRIX OF THE ESTATE OF ROSCOE A. WHITE, DECEASED, AND AS NEXT FRIEND OF ROSCOE A. WHITE, JR., AND RICKY DON WHITE, MINORS, PLAINTIFFS

IN THE DISTRICT COURT OF DALLAS COUNTY, TEXAS

BILL SHAW
DIST. CLERK
DEPUTY *[Signature]*

VS.

ARROW CHEMICAL CORPORATION, DEFENDANT

14TH JUDICIAL DISTRICT

NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

TO: GENEVA WHITE, Individually and As Independent Executrix of the Estate of Roscoe A. White, Deceased, And as Next Friend of Roscoe A. White, Jr. and Ricky Don White, Minors, Plaintiffs by serving their attorney of record, J. HARVEY LEWIS, 104 Merchants State Bank Building, Ross Avenue & Henderson Streets, Dallas, Texas 75206.

You will take notice that after ten (10) days from the service of a copy hereof with attached Questions, a deposition by written interrogatories will be taken of the custodian of the fire inspection records of the Dallas Fire Department, who can be located at 2111 Main, Dallas, Texas. The deposition by Written Questions will be taken before Helen Laidrich, a Court Reporter and Notary Public In and For Dallas County, Texas, whose address is Post Office Box 95, Irving, Texas 75060.

Such deposition with attached Questions may be used in evidence upon the trial of the above styled and numbered cause, pending in the above named Court.

Notice is further given that request is here made as authorized under Rule 201, Texas Rules of Civil Procedure, to the officer authorized to take this deposition to issue a Subpoena Duces Tecum and cause it to be served on the witness to produce the records and reports of the Dallas Fire Department concerning fire inspections and fire hazard inspections made by the Dallas Fire Department on the premises of M & M Equipment Company, located at 10625 Ferguson Road, Dallas, Texas from that period of time from January 1, 1965, through January 1, 1972, and to turn all such records and reports over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

Respectfully submitted

DIRKSMeyer AND WAGNER

BY *[Signature]*
TONY DIRKSMeyer
7700 Carpenter Freeway
Dallas, Texas 75247
Phone: 214/638-8830

CAUSE NUMBER 71-12361-A

GENEVA WHITE, INDIVIDUALLY AS INDEPENDENT EXECUTRIX OF THE ESTATE OF ROSCOE A. WHITE, DECEASED, AND AS NEXT FRIEND OF ROSCOE A. WHITE, JR., AND RICKY DON WHITE, MINORS, PLAINTIFFS | IN THE DISTRICT COURT OF DALLAS COUNTY, TEXAS

VS.

ARROW CHEMICAL CORPORATION, DEFENDANT | 14TH JUDICIAL DISTRICT

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

1. Please state your name.
2. By whom are you employed?
3. As part of your duties at the Dallas Fire Department do you maintain and have the care and custody of the Fire Inspection Records concerning inspections made by the Dallas Fire Department of various business establishments in Dallas, Texas?
4. Please check such records of the Dallas Fire Department and state whether or not the Dallas Fire Department has any records or reports made of fire inspections conducted at the premises of M & M Equipment Company located at 10625 Ferguson Road, Dallas, Texas for that period of time from January 1, 1965, through January 1, 1972.
5. Please state how many fire inspections of this particular premises the records show were made from January 1, 1965, through January 1, 1972.
6. Please list the dates that such fire inspections were made of the premises of M & M Equipment Company located at 10625 Ferguson Road, Dallas, Texas as shown by the records and reports of the Dallas Fire Department.
7. Please hand each and every record and report compiled by the Dallas Fire Department concerning each fire inspection made by the Dallas Fire Department between January 1, 1965, and January 1, 1972, concerning the premises of M & M Equipment Company, located at 10625 Ferguson Road, Dallas, Texas to the Court Reporter taking this deposition in order that she can have copies made of such records, and attach such copies to the deposition.

Respectfully submitted

DIRKSMEYER AND WAGNER

BY Tony Dirksmeyer
TONY DIRKSMEYER
Attorney For Defendant
7700 Carpenter Freeway
Dallas, Texas 75247
Phone: 214/638-8830

FILED
FEB 8 AM 8:55
DALLAS COUNTY TEXAS
CLERK OF DISTRICT COURT

FILED
TIME
JAN 11 1972
Bill Smith
DIST. CLERK, DALLAS CO., TEXAS
M. D. ... DEPUTY

CAUSE NUMBER 71-12361-A

GENEVA WHITE, INDIVIDUALLY AS INDEPENDENT EXECUTRIX OF THE ESTATE OF ROSCOE A. WHITE, DECEASED, AND AS NEXT FRIEND OF ROSCOE A. WHITE, JR., AND RICKY DON WHITE, MINORS, PLAINTIFFS

IN THE DISTRICT COURT OF
DALLAS COUNTY, TEXAS
14TH JUDICIAL DISTRICT

VS.

ARROW CHEMICAL CORPORATION, DEFENDANT

DEFENDANT'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Arrow Chemical Corporation, Defendant in the above cause and files this its Original Answer respectfully showing to the Court as follows:

I.

Your Defendant denies each and every allegation contained in the Plaintiff's Petition and demands strict proof thereof by a preponderance of the evidence as required by law.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that upon a final hearing hereof Plaintiff take nothing and Defendant go hence without costs plus such other relief to which it might be justly entitled in either law or equity.

Respectfully submitted

DIRKSMEYER AND WAGNER

BY *Tony Dirksmeyer*
TONY DIRKSMEYER
Attorney For Defendant
7700 Carpenter Freeway
Dallas, Texas 75247
Phone: 214/638-8830

A copy of this Answer has been mailed to J. Harvey Lewis, 104 Merchants State Bank Building, Dallas, Texas 75206 Attorney of Record for Plaintiff.

71812301 A-14th.
A

NO. FILED

GENEVA WHITE, Individually as Independent Executrix of the Estate of Roscoe A. White, Deceased, and as Next Friend of ROSCOE A. WHITE, JR., and RICKY DON WHITE, Minors, Plaintiff

VS.

ARROW CHEMICAL CORPORATION, Defendant

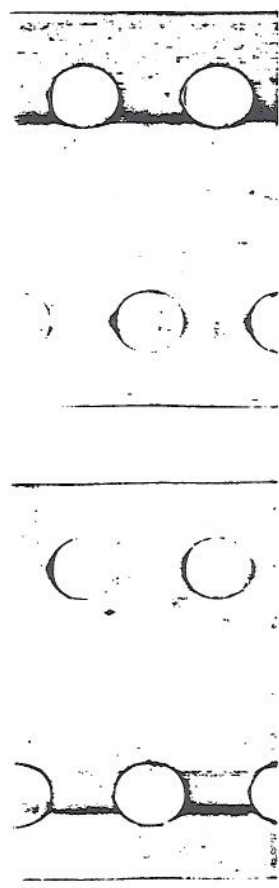
DEC 18 8 58 AM '71
IN THE A-14th DISTRICT COURT
DALLAS COUNTY, TEXAS

Somerset

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

1. Defendant is a Texas corporation, having its principal place of business at 2611 South Central Expressway, Dallas, Texas. Its agent for service is MORRIS SHWISS, and its registered address is 208 North Peak Street, Dallas, Texas.
2. Plaintiff is the widow of ROSCOE A. WHITE, Deceased, who was fatally injured by burns on or about September 23, 1971, caused by the explosion of a can of highly volatile and inflammable liquid known as "PC-68" manufactured and marketed by the Defendant corporation.
3. At the time and on the occasion in question, a quantity of such chemical was in a six gallon container in which it was sold and marketed by the Defendant and was stored in the shop in which Roscoe A. White, Deceased, was employed by M&M Equipment Company as a welder and mechanic. While he was so employed and cutting with a welding torch in the shop in which such chemical was stored in the container furnished and labeled by the Defendant, such can of chemical caught fire and exploded, covering the Deceased Roscoe A. White with such burning chemical and causing third degree burns to approximately 90% of his body, resulting in his death on September 24, 1971.
4. Plaintiff alleges that the Defendant was negligent in marketing such can of highly flammable chemical in a container without having markings on such can in large, distinctive colored letters giving sufficient warning that such chemical was highly inflammable, explosive and dangerous in the presence of heat or flame. No such labeling or warning was placed on the container in which the chemical was sold by the Defendant and in which it was



stored at the time of such explosion. Plaintiff alleges that but for the failure of the Defendant to adequately warn of the dangerous properties of such chemical by labeling its container with words of warning in large and distinctive colored letters that such explosion would not have occurred, and in view thereof, such negligence on the part of the Defendant was the proximate cause of the injuries and damages complained of in this petition.

5. Deceased, Roscoe A. White, was a man of 38 years of age, in good health, and earning approximately \$14,000.00 per year as a mechanic and welder, and could reasonably have been expected to continue in such employment with reasonable and customary increases in pay until retirement age of 65 years. In addition, he was a devoted husband to the Plaintiff and father to his minor children, named in this petition, and kept them more than adequately provided with a home, which he was paying for, automobile, food, clothing, medical care, education, recreation, and other necessary and enjoyable family activities for which the family was dependent upon his earnings. Plaintiff alleges that all of this has been lost as a direct and proximate result of the negligence of the Defendant and that damages have been incurred by reason thereof in the following amounts:

ESTATE OF ROSCOE A. WHITE, DECEASED:

Medical Expenses	\$ 1,330.70
Funeral Expenses	\$ 1,875.94
Pain, Suffering, Mental Anguish & Agony	<u>\$ 15,000.00</u>
Total Damages Incurred by Estate	\$ 18,206.64

GENEVA WHITE, WIDOW OF DECEASED, IN HER INDIVIDUAL CAPACITY:

Loss of the counsel and guidance of her deceased husband	\$ 25,000.00
Loss of his household services and physical help in maintaining the household and raising the two children of the parties	\$ 25,000.00
Loss of probable pecuniary benefits from future earnings of her deceased husband	<u>\$ 188,900.00</u>
Total Damages Incurred by Geneva White, widow of the deceased, in her individual capacity	\$ 238,900.00

ROSCOE A. WHITE, JR., A MINOR SON OF DECEASED, APPROXIMATELY 12 YEARS OF AGE AT HIS FATHER'S DEATH:

Loss of his father's counsel, advice and parental guidance	\$ 25,000.00
Loss of probable pecuniary benefits which would have been furnished to him by his father	\$ 23,400.00
Total Damages Incurred by Roscoe A. White, Jr.	\$ 48,400.00

RICKY DON WHITE, A MINOR SON OF DECEASED, 10 YEARS OF AGE AT HIS FATHER'S DEATH:

Loss of his father's counsel, advice and parental guidance	\$ 30,000.00
Loss of probable pecuniary benefits which would have been furnished to him by his father	\$ 28,600.00
Total Damages Incurred by Ricky Don White	\$ 58,600.00

PLAINTIFF THEREFORE PRAYS that citation be had upon Defendant in the manner prescribed by law, and that upon final hearing, Plaintiff have final judgment against the Defendant in the capacities and in the amounts above alleged, all costs of suit, and such other and further relief at law or in equity to which she may be entitled.

GENEVA WHITE, Individually as Independent Executrix of the Estate of Roscoe A. White, Deceased, and as Next Friend of ROSCOE A. WHITE, JR. and RICKY DON WHITE, Minors, Plaintiff

By


Her Attorney

J. HARVEY LEWIS
Attorney at Law
104 Merchants State Bank Building
Dallas, Texas 75206
821-0113