

**IN THE CIRCUIT COURT  
FOR JEFFERSON COUNTY, BESSEMER DIVISION, ALABAMA**

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**STEPHEN LLOYD GILBREATH,** )  
 )  
 **Plaintiff,** )  
 )  
 vs. )  
 )  
 **ERIC C. PIPPEN,** )  
 **HUGH McCALL,** )  
 **JACK M. CURTIS, et al.,** )  
 )  
 **Defendants.** )  
 )

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**Civil Action Number:  
CV 2011-0349**

**INTERROGATORIES, SET NO. 1, TO DEFENDANT SANDRA McKINNEY**

COMES NOW the plaintiff, pursuant to Rule 33 of the Alabama Rules of Civil Procedure, and propounds the following interrogatories to Defendant Sandra McKinney to be answered within the time and scope of the law:

1. State your correct name, residence address, business address, date of birth and social security number.
2. Are you presently employed? If so, state the name(s) of your present employer(s), how long you have been employed there, what your present duties are, and if self –employed describe exactly what percent of ownership you have in your place(s) of employment and provide the names and percent of ownership of all other owners, if any, of the place(s) of your employment.
3. Have you in the past ten years been a plaintiff or defendant in a lawsuit previous to the filing of this suit? If so, for each lawsuit, state the style and civil action number of each lawsuit.
4. Give the name and address of the registered owner of every vehicle that McKinney Wrecker Service has towed within the past ten years that was unattended at the time of placing the vehicle in tow.
5. Give the name and address of each and every individual or entity to whom the owners or any agent or employee of McKinney Wrecker Service has given any form of gift or payment within the past ten years and state the reasonably estimated value of each gift and the amount of each payment together with the name and address of each individual or entity to whom each such gift or payment has been made during the past ten years.

6. Describe in detail all communication and correspondence whether spoken or written and the location of all recorded or written data or information in any form that you or McKinney Wrecker Service has had or possesses regarding the vehicle identified by the VIN of 1GCEK14K4RZ251744.

7. Give the names and addresses of each individual with whom you have had any communication, written or otherwise, regarding anything to do with the vehicle identified by the VIN of 1GCEK14K4RZ251744 and provide the full substance of what was said or written or recorded in any way and the dates of all such communications or correspondence and how and where each such communication was noted or recorded and where each such notation or recording is maintained or stored.

8. Did you or any other owner or agent or employee of McKinney Wrecker Service at any time make any attempt to give notice to the registered owner that McKinney Wrecker Service had seized and towed the vehicle identified by the VIN of 1GCEK14K4RZ251744?

9. Give the name and address and employee or badge number of the individual, whom you identified merely as a State Trooper to the plaintiff, with whom you had a telephone conversation on June 28, 2011, and give the substance of what was said between you and the Trooper while the Plaintiff waited in your presence at the McKinney Wrecker Service facility at 4901 Truman Adrich Parkway, West Blockton, Alabama, to be escorted following the plaintiff's request, made before you made the Trooper phone call, to retrieve his license plate from the vehicle identified by the VIN of 1GCEK14K4RZ251744 1G held at the herein referenced McKinney Wrecker Service facility.

10. REPHRASE AN ABOVE QUESITON WITH THIS – maybe to distinguish any written communications from any oral comms in a separate QUESTION: Give the names and addresses of all individuals with whom you spoke regarding the vehicle identified by the VIN of 1GCEK14K4RZ251744 and the dates on which you spoke to each and the details of what was said (who said what and when).

11. Photographs MAYBE SAVE THIS FOR ROGS TO TROOPER. . . . Were any photographs taken at the site from which the vehicle identified by the VIN of 1GCEK14K4RZ251744 was seized for tow on April 23, 2011. If so, identify who took such photographs and where such photographs are presently located.

12. Describe any and all financial assessments or charges that you or McKinney Wrecker Service has applied against the vehicle identified by the VIN of 1GCEK14K4RZ251744 from the date of tow to the date of your answer to this first set of interrogatories and give the date and explanation of each charge so applied.

13. Describe any and all repairs that McKinney Wrecker Service has performed on the vehicle identified by the VIN of 1GCEK14K4RZ251744.

14. Did you or any owner or agent or employee of McKinney Wrecker Service at any time make inquiry as to whether full compliance had been made with Alabama Code Section 32-13-2 in that the vehicle identified by the VIN of 1GCEK14K4RZ251744 was unattended when the McKinney Wrecker Service tow truck arrived? If not, why not?

15. Give the name and address of each and every expert witness who will testify in your behalf in the trial of this case.

- a. State the opinions of such expert; and
- b. State the facts relied upon by the expert in support of his opinion.

16. Give the name and address of all individuals with whom you have consulted regarding this lawsuit. What recommendations were made to you concerning it?

17. Did you make any comments at any time in which you stated in any way that if the plaintiff had not come to the McKinney Wrecker Service facility and showed an interest in retrieving the vehicle identified by the VIN of 1GCEK14K4RZ251744 that you could have sold it. If so, describe in detail any such comments and to whom you made them and when.

18. Did you at any time tell the plaintiff or any other person(s) that vehicle identified by the VIN of 1GCEK14K4RZ251744 was “totaled”? If so, give the number of and names of the individuals to whom you stated that vehicle identified by the VIN of 1GCEK14K4RZ251744 was “totaled.”



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Stephen L. Gilbreath  
Plaintiff in Propria Persona

**PLAINTIFF IN PROPRIA PERSONA:**

STEPHEN L. GILBREATH  
c/o Church of God Ministry  
44 Southwood Drive  
Alabaster, Alabama 35007-5380  
205.461.6366  
[slg@cogtv.com](mailto:slg@cogtv.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing on the following via United States mail, properly addressed, postage prepaid, on this the \_\_\_\_\_ day of July 2011.

Please serve Defendants via Certified U.S. Mail at:

Eric C. Phippen  
c/o Alabama Department of Public Safety  
301 South Ripley Street  
Montgomery, AL 36104

Hugh McCall  
c/o Alabama Department of Public Safety  
301 South Ripley Street  
Montgomery, AL 36104

Jack M. Curtis  
c/o Alabama Department of Public Safety  
301 South Ripley Street  
Montgomery, AL 36104

Gene McKinney II  
c/o McKinney Wrecker Service  
4901 Truman Adrich Parkway  
West Blockton, AL 35184

Sandra McKinney  
c/o McKinney Wrecker Service  
4901 Truman Adrich Parkway  
West Blockton, AL 35184

Al A. Britain  
617 Nineteenth Street  
Bessemer, Alabama 35020-4866



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Stephen L. Gilbreath  
Plaintiff in Propria Persona