

CROSS INTERROGATORY

REPLY.

1. Do you know the firm known as Lever Brothers, Ltd. of England? Yes, by repute, as Soap Manufacturers and incidentally as Shipowners for many years.
2. If your answer to this question is "Yes" please state how long you have known them, or of them, and whether you know what business they are in.
3. Do you know the firm of Henry Tyrer & Co., Ltd. of 360, Royal Liver Building, Liverpool, England? I know of such a firm, but I cannot recall that I have ever met any member of the firm.
4. Did you, <sup>or</sup> the Secretary of Lloyd's Register of Shipping, at Fenchurch Street, London, England, if you know of your own knowledge, receive a letter from this firm, dated 17th December, 1919, in reference to the wooden motor schooner "Elizabeth Ruth", involved in this action, a copy of which letter is annexed hereto, marked "Exhibit "A", which is shewn you herein?  
(The Commissioner will please show the witness exhibit "A"). The date given would seem to be ~~inaccurate~~ and should be 17th December, 1918.
5. If your answer to this question is in the affirmative, please state whether you, or your Company, Lloyd's Register of Shipping, have that letter, and if you have, please produce same.  
(The Commissioner will please direct the witness to produce said letter). Produce letter dated 17th December, 1918 from Henry Tyrer & Co., Ltd.,
6. Have you produced the letter referred to in questions 4 and 5? Yes.
7. Are you willing that the original of said letter should be annexed to this Commission and returned to the United States? No.
8. If not, will you please make an exact copy thereof and deliver it to the Commissioner? (The Commissioner will please identify and annex the same to this Commission). Yes. (produce copy of letter dated 17th December, 1918.
9. Did you send the original or a copy of said letter to your Lloyd's Register of Shipping Office at 17 Battery Place in New York? Yes. a copy was sent to the Society's Office in New York on the 24th December, 1918.
10. Did you, after sending the original or a copy of said letter to your New York Office, receive any communication from your New York Office, Lloyd's Register of Shipping to the effect that a copy of this letter from Henry Tyrer & Co. was mailed by your Mr. R.P. Hutchinson, the Secretary of Lloyd's Register of Shipping in New York, to Mr. J.M. Buchanan at New Orleans on January 13th 1919? A letter dated 20th January, 1919, was received from the Secretary of the Society's Office at New York, indicating that he had communicated with Mr. J.M. Buchanan on the subject of the "Elizabeth Ruth".

11. If your answer to the last question is in the affirmative please produce said communication. (The Commissioner will please direct the witness to produce same).
12. Have you produced the communication referred to in questions 9, 10 & 11?
13. Are you willing that said communication should be annexed to this commission and returned to the United States?
14. If not, will you please make an exact copy thereof, and deliver same to the Commissioner. (The Commissioner will please identify and annex the same to this commission).
15. If in your answers to questions 4, 5, 10 & 11 you state that neither you nor your company has the different communications therein referred to, will you please state what became of them and where they are now located, and how access can be had to same and copies made?
16. Did you or your London office receive from your New York Office a letter, or a copy of a letter annexed hereto and marked Exhibit "B" which is shown you herein? (The Commissioner will please show to the witness "Exhibit" B).
17. If your answer to the last question is in the affirmative, please produce the letter or the copy. (The Commissioner will please direct the witness to produce same).
18. Have you produced the letter referred to in questions 16 & 17?
19. Are you willing that the original of said letter should be annexed to this commission and returned to the United States?
20. If not, will you please make an exact copy thereof and deliver the same to the Commissioner. (The Commissioner will please identify and annex the same to this commission).
21. If your answer to the 16th, 17th and 18th interrogatories is that you or your company have not said letter, will you please state where it is now lodged, and where access can be had thereto and copies made.
22. Did you or your company receive a communication from your New York Office to the effect that Mr. Buchanan on January 16th, 1919, replied to the copy of the letter sent him of Henry Tyrer & Co. addressed to you dated December, 17th, 1918?

Produce New York Letter  
dated 20th January, 1919.

Yes.

No.

Produce copy. of New York  
letter dated 20th January, 1919.

No.

No.

I do not know where it is.  
~~It would probably be retained  
by Mr. Buchanan.~~

I have produced in reply to question  
11 a letter dated 20th January, 1919,  
received from the Society's Office  
in New York on the subject.

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23. Please state whether you or your company in London received from your New York Office, or Buchanan direct, the original reply made by him to the letter referred to in question 22, a copy of which is hereto annexed and marked "Exhibit" "C", and shown you herein.

(The Commissioner will please show witness Exhibit "C")

24. If your answer to the last question is in the affirmative, please produce Buchanan's original reply, a copy of which is herein marked Exhibit "C".

(The Commissioner will please direct the witness to produce same)

25. Have you produced Buchanan's reply, and if so will you state if the signature to said letter is Buchanan's and whether you are familiar with his handwriting?

26. Are you willing that this original of Buchanan's letter should be annexed to this commission and returned to the United States?

27. If your answer is "Yes", please deliver same to the Commissioner. If your answer is "No", make an extract copy of said letter and deliver same to the Commissioner. (The Commissioner will please identify and annex the same to this commission).

28. If your answer to the questions 23 & 24 is that you or your company have not the original copy of said letter in your possession, will you please state where it now is located and where access can be had thereto, and a copy made?

29. Please look at the copy of said Buchanan's letter, hereto annexed and marked Exhibit "C" and shown you, and state whether that is an exact and correct copy of the original received by you or your Company or your New York Office.

30. Please state whether upon receipt of this letter from Buchanan, you or your company wrote to or communicated with Messrs. Henry Tyrer & Co., Ltd.,

31. If your answer to the last question is in the affirmative, please produce such communication. (The Commissioner will please direct the witness to produce the same).

No.

I do not know.

I do not know.

The letter in question from Mr. Buchanan was not received by us but after receipt of the letter dated 20th January, 1919 from the Society's Office at New York a letter dated 12th February, 1919 was addressed from the London Office of Lloyd's Register of Shipping to Messrs. Henry Tyrer & Co., Ltd. in reply to their communication of the 17th December, 1918. A copy of the letter dated 12th February, 1919, is here produced.

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32. Have you produced the communication referred to in questions 30 and 31? ✓

33. Are you willing that said letter should be annexed to this commission and returned to the United States?

The original is not in our possession.

34. If not, will you please make an exact copy thereof and deliver it to the Commissioner.  
(The Commissioner will please identify and annex the same to this Commission).

Yes

35. If your answers to questions 30, 31 and 32 is that you have not same in your possession, please state the substance of said letter and where same is now located and where access can be had thereto and copies made. ✓



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