

CROSS-INTERROGATORIES TO BE PROPOUNDED TO

A. SCOTT.

1. Q. Do you know the firm known as Lever Brothers, Ltd., of England?
2. Q. 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. Q. Do you know the firm of Henry Tyer & Co. Ltd., of 360 Royal Liver Building, Liverpool, England.
4. Q. Did you, or the Secretary of Lloyds Register of British and Foreign Shipping, at Fenchurch Street, London, England, if you know of your own knowledge, receive a letter from this firm, dated the 17th of 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 shown you herein. ✓

(The Commissioner will please show the witness Exhibit "A").

5. Q. If your answer to this question is in the affirmative, please state whether you or your company, Lloyds Register of British and Foreign Shipping, have that letter, and if you have, please produce same.

(The Commissioner will please direct the witness to produce said letter).

6. Q. Have you produced the letter referred to in questions 4 and 5?

7. Q. Are you willing that the original of said letter should be annexed to this commission and returned to the United States?

8. Q. 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).

9. Q. Did you send the original or a copy of said letter to your Lloyds Register of Shipping office at 17 Battery Place, in New York.
10. Q. 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, Lloyds Register of Shipping, to the effect that a copy of this letter from Henry Tyer & Co., was mailed by your Mr. R. P. Hutchinson, the Secretary of Lloyds Register of Shipping in New York, to Mr. J. M. Buchanan at New Orleans on January 13th, 1919?
11. Q. 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. Q. Have you produced the communication referred to in questions 9, 10 and 11?
13. Q. Are you willing that said communication should be annexed to this commission and returned to the United States?
14. Q. 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. Q. If in your answers to questions 4, 5, 10 and 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. Q. 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. Q. 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. Q. Have you produced the letter referred to in questions 16 and 17.

19. Q. Are you willing that the original of said letter should be annexed to this commission and returned to the United States?

20. Q. 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. Q. 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 located, and where access can be had thereto, and copies made.

22. Q. 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, 1919?

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

27. Q. If your answer is "Yes", please deliver same to the Commissioner. If your answer is "No", make an exact copy of said letter and deliver same to the Commissioner.

(The Commissioner will please identify and annex the same to this commission.)

28. Q. If your answer to the questions 23 and 24, is that you or your company have not the original or 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. Q. 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. Q. 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. Q. 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).

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

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

34. Q. 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).

35. Q. If your answer 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.



© 2020

Lloyd's Register
Foundation

W1104 0290 515