IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DIVISION OF TEXAS

BEAUMONT, TEXAS

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MAR 27 1970
JAMES R. COONEY, CLERK
BY DEPUTY

CLARENCE BOREL	§	
	§	
V.	§	CIVIL ACTION NO. 6449
	§	
FIBREBOARD PAPER PRODUCTS, ET AL	§	

MOTION OF DEFENDANT ARMSTRONG CORK COMPANY FOR EXTENTION OF TIME TO ANSWER, OBJECT OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST SET OF INTERROGATORIES WHICH WERE SERVED UPON DEFENDANT's COUNSEL MARCH 24, 1970, AND TO EXTEND THE TIME FOR DEFENDANT TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S MOTION FOR DISCOVERY LIKEWISE SERVED ON DEFENDANTS' COUNSEL ON MARCH 24, 1970

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Armstrong Cork Company who was just recently made a party defendant in the above captioned cause and respectfully moves the Court to grant an extension of time within which to answer, object or otherwise plead to plaintiff's first set of interrogatories and to answer, object and otherwise plead to plaintiff's motion for discovery until May 8, 1970.

I.

Your defendant would respectfully show to the Court that it was just made a party defendant to the above cause by an amended complaint which was served upon it on February 24, 1970, and that it filed its answer in this cause on March 11, 1970; that all of the matters inquired about inthe interrogatories and in the motion to produce will have to be collected and assembled in the State of Pennsylvania; that counsel does not have the facilities for the accumulation of the information called for, and must necessarily rely upon correspondence passing between counsel and the client. That this motion is not being filed for the

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purpose of delay, and movant would respectfully show to the Court that granted the time herein prayed for that it will make every effort to prepare and file its responses subsequent thereto, and will within the time limited requested.

Respectfully submitted,

FULBRIGHT, CROOKER, FREEMAN, BATES & JAWORSKI

By _____
W. N. Arnold, Jr.

Bank of the Southwest Building
Houston, Texas 77002 224-7070

Attorneys for Armstrong Cork Company

CERTIFICATE OF SERVICE

I, W. N. Arnold, Jr., one of the attorneys of record for the Defendant, Armstrong Cork Company, hereby certify that a true and correct copy of the above and foregoing Motion for Extention of Time to Answer was on this 26th day of March, 1970, mailed to Messrs. Stephenson & Thompson, P. O. Box 68, Orange, Texas 77630, attorneys of record for the Plaintiff, by mailing same through the United States mail properly stamped and addressed.

_____
W. N. Arnold, Jr.

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NO. 6449

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS, BEAMONT DIVISION

CLARENCE BOREL

V.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

MOTION OF DEFENDANT ARMSTRONG CORK COMPANY FOR EXTENTION OF TIME TO ANSWER, OBJECT OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST SET OF INTERROGATORIES WHICH WERE SERVED UPON DEFENDANT'S OUNSEL MARCH 2$, 1970 AND TO EXTEND THE TIME FOR DEFENDANT TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S MOTION FOR DISCOVERY

FULBRIGHT, CROOKER, FREEMAN, BATES & JAWORSKI
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