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FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MAY 15 1970
JAMES R. COONEY, CLERK
BY DEPUTY Margaret Turner

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLARENCE BOREL	§	
	§	
VS.	§	C. A. NO. ~~6649~~ 6449
	§	
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL	§	

REPLY OF EAGLE-PICHER INDUSTRIES, INC.,
TO MOTION OF PLAINTIFF
TO COMPEL ANSWERS TO FIRST SET OF
INTERROGATORIES TO DEFENDANTS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, Eagle-Picher Industries, Inc., and files this, its reply to Plaintiff's motion to compel answers to first set of interrogatories directed to the Defendants, which include Eagle-Picher Industries, Inc., and as grounds for said reply would show:

1.

This Defendant objects to being charged with the responsibility for the answers of the Defendant, Armstrong Cork Company, and says that it prefers to rely upon its own independent answers to such interrogatories.

Further, this Defendant says that it is not proper to assume that each and all of the answers of the Defendants are the same, but to the contrary, each and all of the answers of the various Defendants are not the same and this Defendant can only be responsible for its own answers to said interrogatories.

2.

This Defendant has asserted objections to certain of Plaintiff's interrogatories, which objections this Defendant

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believes to be valid. After the Court has ruled on the objections of this Defendant, this Defendant will certainly comply with the order of the Court to the best of its ability

WHEREFORE, premises considered, this Defendant prays that the Plaintiff's motion be denied as to the Defendant, Eagle-Picher Industries, Inc.

Respectfully submitted,

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By Ben L. Reynolds
Ben L. Reynolds
Attorneys for Defendant,
Eagle-Picher Industries, Inc.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was served on the following attorneys by mailing a true and correct copy thereof to their respective offices on the 14th day of May, 1970.

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C. A. NO. 6649

IN THE UNITED STATES
DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

CLARENCE BOREL

VS.

FIBREBOARD PAPER PRODUCTS
CORPORATION ET AL

REPLY OF EAGLE-PICHER
INDUSTRIES, INC. TO
MOTION OF PLAINTIFF TO
COMPEL ANSWERS TO FIRST
SET OF INTERROGATORIES

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The Borel v. Fibreboard Case File (1969-1972), Reply to plaintiff's motion to compel
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