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

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

JUL 1 1970

JAMES R. COONEY, CLERK
By Imogene R. Jones

CLARENCE BOREL

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.

CIVIL ACTION NO. 6449.

DEFENDANT RUBEROID COMPANY'S
SUPPLEMENTARY REPLY TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES

TO THE PLAINTIFF, CLARENCE BOREL, AND MR. WARD STEPHENSON, STEPHENSON BUILDING, ORANGE, TEXAS, HIS ATTORNEY OF RECORD:

COMES NOW Ruberoid Company, one of the Defendants in the above styled and numbered cause, and makes and files this its SUPPLEMENTARY REPLY TO PLAINTIFF'S FIRST SET OF INTERROGATORIES, respectfully representing the following:

INTERROGATORY NO. 85:

In general our Company does not recognize that just any exposure to asbestos will cause asbestosis. However, the Company is aware that prolonged exposure to asbestos fibers without proper safety precaution may cause asbestosis in some people. The Company has been aware of this for about five to six years. In response to this, we have added equipment to our various plants using asbestos fibers to collect and eliminate dust. Also, all employees in contact with asbestos fibers are required to wear U. S. Bureau of Mines approved respirators.

Robert E. Barnes.

Sworn to and subscribed before me, the undersigned authority, on this the 1st day of July, 1970.

Beatrice L. Engel
Notary Public in and for
Jefferson County, Texas.

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Respectfully submitted,

BARNES & BARNES

BY Robert E. Barnes

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Beaumont, Texas,
Telephone 833-8601,
Attorneys for Ruberoid Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon Mr. Ward Stephenson, Stephenson Building, Orange, Texas, Attorney for Plaintiff, by mailing the same to his address on the 1st day of July, 1970, and a copy was served on each and all other counsel of record by depositing the same in the United States mail properly addressed, with postage paid, on the 1st day of July, 1970.

Robert E. Barnes
Robert E. Barnes.

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