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

CLARENCE BOREL	§	
	§	
VS.	§	CIVIL ACTION NO. 6419
	§	
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL	§	

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
JUL 8 - 1970
JAMES R. COONEY, CLERK
BY DEPUTY Margaret Turner

ANSWER OF UNARCO INDUSTRIES, INC. IN COMPLIANCE WITH ORDER ON PLAINTIFF'S MOTION FOR DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, UNARCO INDUSTRIES, INC., and in response to the order of this Court dated June 23, 1970, files this, its Answer and reply to Plaintiff's Motion for Discovery:

I.

This Defendant has heretofore furnished samples of its products containing asbestos that are used in insulating work and has so identified each sample with the name of the manufacturer and trade name of the product and likewise has furnished to the Plaintiff all available sales literature pertaining to products containing asbestos and used in insulation. Such samples and literature were furnished to Plaintiff's counsel in the case styled Samuel R. Potter v. Fibreboard Paper Products Corporation, et al, Civil Action No. 6329.

II.

This Defendant has given in its Answer to interrogatories at least one type of respirator which would materially reduce inhalation of asbestos dust and fibers.

III.

By a copy of letter attached hereto, Defendant is

719

Published by AsbestosClaims.Law
asbestosclaims.law/library/10170/1

requesting counsel for Plaintiff to advise if there is any material which is required under this Order which has not been delivered to him and the information given in this case or in the case of Samuel R. Potter v. Fibreboard Paper Products Corporation.

Respectfully submitted,

VINSON, ELKINS, SEARLS & CONNALLY

By: Gerald P. Coley
Gerald P. Coley
First City National Bank Bldg.
Houston, Texas 77002 - 225-2411
ATTORNEYS FOR DEFENDANT, UNARCO 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 7th day of July, 1970.

Mr. Ward Stephenson
Stephenson & Thompson
Stephenson Building
Orange, Texas

Mr. George E. Duncan
P. O. Box 3708
Beaumont, Texas 77704

Mr. Gordon R. Pate
Beaum ont Savings Bldg.
Beaumont, Texas 77701

Mr. W. N. Arnold, Jr.
Fulbright, Crooker, Freeman,
Bates & Jaworski
Bank of the Southwest Building
Houston, Texas 77002

Mr. Ben L. Reynolds
Royston, Rayzor & Cook
877 San Jacinto Bldg.
Houston, Texas 77002

Mr. Robert E. Barnes, Jr.
P. O. Box 5098
Beaumont, Texas 77706

Mr. Dale Dowell
707 Beaumont Savings Bldg.
Beaumont, Texas

Mr. George A. Weller
Weller, Wheelus, Green & Brocato
P. O. Box 350
Beaumont, Texas 77704

Mr. James W. Mehaffy, Sr.
San Jacinto Building
Beaumont, Texas 77701

Mr. Charles S. Pipkin
P. O. Box 1632
Beaumont, Texas 77704

Mr. John G. Tucker
Orgain, Bell & Tucker
Beaumont Savings Bldg.
Beaumont, Texas 77701

Mr. Frank Bean
Bean & Manning
500 Jefferson Bldg.
Houston, Texas

Gerald P. Coley
Gerald P. Coley

720

Published by AsbestosClaims.Law
asbestosclaims.law/library/10170/2

VINSON, ELKINS; SEARLS & CONNALLY
ATTORNEYS AT LAW
FIRST CITY NATIONAL BANK BUILDING
HOUSTON, TEXAS 77002

TEL: AC 713 225-2411
CABLE ADDRESS: VEWS

July 7, 1970

Re: Civil Action No. 6449, Clarence Borel v. Fibreboard Paper Products Corporation, et al; in the District Court of the United States for the Eastern District of Texas, Beaumont Division

Mr. Ward Stephenson
Stephenson & Thompson
Stephenson Building
Orange, Texas

Dear Mr. Stephenson:

In the case of Samuel R. Potter v. Fibreboard Paper Products Corporation, et al, I have furnished you with samples of all products containing asbestos used in insulation. In answers to interrogatories, I have listed two or three products containing asbestos, which I later found were not used in insulation. However, if you would like to have samples of these products, please let me know and we will be more than happy to furnish the samples to you. All the samples furnished were identified. Sales literature was also furnished to you in connection with the Potter case. My client does not have a medical research or scientific research department. We gave you the name and address of the company representative that we expect to appear at the time of the trial of this case in connection with the Potter case. However, I understand now that he is no longer employed by my client. We will comply with the Court's Order to furnish you the name and address of the representative that we expect to have present, within 30 days prior to the date this case is set for trial.

If there is any discovery matter that I have overlooked and have not complied with pursuant to the Court's Order, I would appreciate it if you will advise me.

Very truly yours,

VINSON, ELKINS, SEARLS & CONNALLY

By Gerald P. Coley
Gerald P. Coley

196/254A

721

Published by AsbestosClaims.Law
asbestosclaims.law/library/10170/3

CIVIL ACTION NO. 6449

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

CLARENCE BOREL

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

ANSWER OF UNARCO INDUSTRIES, INC. IN COMPLIANCE WITH ORDER ON PLAINTIFF'S MOTION FOR DISCOVERY

VINSON, ELKINS, SEARLS & CONNALLY
ATTORNEYS AT LAW
FIRST CITY NATIONAL BANK BUILDING
HOUSTON, TEXAS 77002

GPC

Published by AsbestosClaims.Law
asbestosclaims.law/library/10170/4