In the United States District Court
For the Eastern District of Texas
[redacted] Division

Clarence Borel
vs.
Fibreboard Paper Products
Corporation, et al
Civil Action No. 6449

Written Depositions of Dr.
Raymond Jenski and
Dr. Kenneth R. Watkins

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
AUG 31 1970
JAMES R. COONEY, CLERK
BY DEPUTY Imogene R Jones

Dept. $70.00

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

CLARENCE BOREL §

VS. § CIVIL ACTION NO. 6449.

FIBREBOARD PAPER PRODUCTS §
CORPORATION, ET AL

* *

ANSWERS AND DEPOSITIONS OF DR. KENNETH R. WATKINS, who resides in Jefferson County, State of Texas, to the accompanying direct interrogatories propounded to him in the above entitled and numbered cause, taken before Odessa J. Smith, a Notary Public in and for Jefferson County, Texas, in accordance with the accompanying commission.

ANSWERS OF THE WITNESS:

1. Dr. Kenneth R. Watkins.

2. Yes.

3. He came to my office on his own on 11-26-68; 1-30-69; and 2-25-69. The first time he was given antibiotics; the second time he was X-rayed and I made an appointment with Dr. Self for him.

4. I have my office notes.

5. The summaries would be in the hospital records.

6. I have a report from a doctor in Houston, which I am handing to the Reporter.

7. No.

ODESSA J. SMITH
Shorthand Court Reporter
Beaumont, Texas

The Borel v. Fibreboard Case File (1969-1972), Written deposition of Dr. Watkins, with exhibits Published by AsbestosClaims.Law
ACL Doc 10215 · Page 2 of 20 asbestosclaims.law/library/10215/2

DR. KENNETH R. WATKINS.

SWORN TO AND SUBSCRIBED before me, under my official hand and seal, this the 14th day of July, A. D., 1970.

ODESSA J. SMITH, NOTARY PUBLIC
IN AND FOR JEFFERSON COUNTY, TEXAS.

THE STATE OF TEXAS

COUNTY OF JEFFERSON

I, Odessa J. Smith, a Notary Public in and for Jefferson County, Texas, do hereby certify that the foregoing answers of DR. KENNETH R. WATKINS, the witness before named, were signed and sworn to by the said witness before me.

ODESSA J. SMITH, NOTARY PUBLIC
IN AND FOR JEFFERSON COUNTY, TEXAS.

ODESSA J. SMITH
Shorthand Court Reporter
Beaumont, Texas

The Borel v. Fibreboard Case File (1969-1972), Written deposition of Dr. Watkins, with exhibits Published by AsbestosClaims.Law
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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

CLARENCE BOREL	)	
	)	
VS.	)	CIVIL ACTION NO. 6449
	)	
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL	)	

TO: CLARENCE BOREL, PLAINTIFF, AND HIS ATTORNEY, MR. WARD STEPHENSON, STEPHENSON & THOMPSON, STEPHENSON BUILDING, ORANGE, TEXAS:

Please take notice that the deposition of **Dr. Kenneth R. Watkins, 6265 - 39th St., Groves, Jefferson County, Texas**, will be taken by propounding the attached interrogatories and such cross-interrogatories as plaintiff may serve upon the undersigned within ten (10) days after service of this notice, and that defendants will apply to the Clerk of the United States District Court for a subpoena for said witness and a subpoena duces tecum requiring said witness to produce all notes, including patient's history or histories, complaints, memoranda regarding examination, X-ray reports, consultation reports from other doctors, X-rays and X-ray reports, written reports or opinions given by said witness relating to any examination and/or treatment of Clarence Borel.

DATED this 9th day of June, 1970.

GEORGE E. DUNCAN
P. O. BOX 3708
BEAUMONT, TEXAS 77704

DALE DOWELL
707 BEAUMONT SAVINGS BUILDING
BEAUMONT, TEXAS 77701

GORDON R. PATE
BEAUMONT SAVINGS BUILDING
BEAUMONT, TEXAS 77701

W. N. ARNOLD, JR.
BANK OF THE SOUTHWEST BUILDING
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BEN L. REYNOLDS
877 SAN JACINTO BUILDING
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JOHN G. TUCKER
BEAUMONT SAVINGS BUILDING
BEAUMONT, TEXAS 77701

GEO. A. WELLER
P. O. BOX 350
BEAUMONT, TEXAS 77704

BY Geo. A. Weller
GEO. A. WELLER

CERTIFICATE OF SERVICE

A copy of the foregoing notice was mailed by certified mail, return receipt requested, to Mr. Ward Stephenson, Stephenson & Thompson, Stephenson Building, Orange, Texas, attorney for plaintiff, on the 9th day of June, 1970.

Geo. A. Weller
GEO. A. WELLER

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DIRECT INTERROGATORIES TO BE PROPOUNDED
TO THE WITNESS

1. What is your name?

2. Have you ever examined **Clarence Borel** ?

3. How many times have you examined him and at whose request? Give the date or dates of each examination and treatment, if any.

4. Did you or your nurse or office personnel take a history on each occasion, and did you make any office memoranda of your examination and/or treatment, your findings and prognosis? If you have answered this interrogatory "yes," as to any one or more of such items requested, then please attach a photocopy of each and every office record and memoranda or report to your answers, or if you refuse to do so, then please read such report to the court reporter in full.

5. Have you ever given a written report as to your findings and conclusions based upon your examination or examinations? If so, please attach a copy of each and every report to your answers, or failing to attach a copy, please read each and every report in full to the court reporter.

6. Do you have any medical reports from any other physician or technical personnel as to their findings and conclusions based upon an examination or tests given to the above named patient? If you have answered this interrogatory "yes," then furnish the court reporter a copy of such report or reports, or failing to do so, read such report in full to the court reporter.

7. Have you ever had an occasion to examine **Clarence Borel** _____ and have not written a report about your

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findings and conclusions? If you have answered this interrogatory "yes", then give the history given to you by the patient and a complete summary of your findings and conclusions.

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BEAUMONT, TEXAS 77704

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707 BEAUMONT SAVINGS BUILDING
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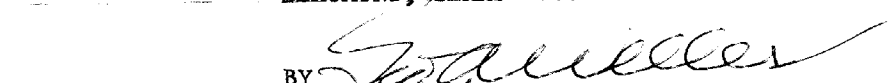
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P. O. BOX 350
BEAUMONT, TEXAS 77704

BY 
GEO. A. WELLER

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Deed

NAME Borel CASE NO. SHEET NO.

DATE MO.	DAY	YR.	SUBSEQUENT VISITS AND FINDINGS
1	25	68	Mrs. Ultrasonic 6 pt. chordis 70 cpt
1	27	68	Mrs " " "
1	30	68	" " "
2	1	68	" " Wattage - Treatment
			40 cm hips prod entire Pain Pt Shoulder
2	2	68	Chronic Pain f. Rt Pain
2	8	68	Mr. Anstamoter - OT - Has L. Apical flu
			Pain Pain OT - Feels good -
			(OFF) resp disease - Back Pain
			as of today - No disability
2	22	68	Mr. Borel - Hospitalized for appx L. Thoracotomy.
			Generalized Pneumo + Carcinoma "32.00
			Thor: Pneumolet Borel to A. Shondack. 93.00

"HISTACOUNT" FORM NO. 158 PROFESSIONAL PRINTING COMPANY, INC., MELVILLE, L. I., N. Y.

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NAME Borel, Clarence CASE NO. _____ SHEET NO. _____

DATE MO.	DAY	YR.	SUBSEQUENT VISITS AND FINDINGS
1st Day			
1	22	67	Pt - MM Dies Auto accident - 1/21/67 - 3 PM
			acute pulled out in front of him -
			Pt. knew there was accident with Car
			Eleven and Expressway cut + some X-rays
			at hospital - Pt. Pt. Battle City X-rayed
			Laceration of R Foot toes -
			Max Tuy Pt. home -
			Pain Continuing Head Pain - Dizzy
			Neck Stiff & Hurt - R Arm - Bruises
			Pain, Pain & Numbness Cervical Lat
			GP Chest - neg - Max Pt. Shoulder
			Pain - Tenderness Shoulder
2nd Day			
1	23	67	MM Pt. Pain Hip L-6 Disc 6-11-66

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NAME Borel, Jean Dir. Claude CASE NO _____ SHEET NO. _____

DATE MO.	DAY	YR.	SUBSEQUENT VISITS AND FINDINGS
8	12	68	Mrs Harp. Marked Lymph Burden R Shoulder — Hypertrophy — Tenderness-102 Lcc Lip - Fatty diet. R Lips Flaccid Change Lips Glandular Hypertrophy Flaccid TTD
9	13	68	Mrs: Chest 270 BP 120/80 - R Calcified
10	19	68	Mrs - Chest 210 BP 138/80 - Chg ok Hesitancy D — R Calcified
11	26	68	Mr. BP 114/88 - T99. - Bronchitis & pleurisy MRT - R Pneumonia Lc. - R - Pleurisy #3
1	30	69	Mr. - app. to Dr. Sell - Friday Jan. 31, 1969. - Left 24
2	25	69	Mr - AP Chest x-ray. Fluid in Rt Hemithorax Lower chest & Situation & Seen - Injured Jan 19-20 Following T.C. will go to Houston for Surg

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NAME Clarence Borel CASE NO. _____ SHEET NO. _____

DATE MO.	DAY	YR.	SUBSEQUENT VISITS AND FINDINGS
9	22	69	Wife. Dyspnea - only fast - Acute gastritis BP 140/80 - Chest ok. Leg edema. Flat foot R Pneumatax - Impr. Pleurisy TTD Chad: 190 -
4	14	70	Wife. - Fair progress - Fine B.S. -
4	20	70	Mr. Narcotics - pain - 100 cc Sustanon 250 mg IM Diagnosis Dermatitis

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NAME _____ CASE NO. _____ SHEET NO. _____

DATE MO.	DAY	YR.	SUBSEQUENT VISITS AND FINDINGS
12	30	66	[illegible] – T. 957 [illegible] – [illegible] [illegible] – [illegible]

"HISTACOUNT" FORM NO. 158 HISTACOUNT CORPORATION, MELVILLE, L. I., N. Y.

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WALLACE PHARMACEUTICALS/Cranbury, N.J. 08512
Deprol®
(meprobamate 400 mg. - benactyzine hydrochloride 1 mg.)

(a) Medullary Failure
mm

b) Overwhelming
Toxemia days

c) Generalized Carcinomatosis
Primary Site L lung
1½ yrs

Part II Chronic asbestosis
of lung

Carcinomatosis

CASE NO. _____

Borel, Clarence + Thelma
PATIENT'S NAME

ADDRESS 4500 - Lawndale INSURANCE _____ DATE 1-25-67

W02 5257
TEL. NO. REFERRED BY OCCUPATION AGE SEX S.M.W.D.

MOTHER _____

HEART DISEASES _____ RHEUMATISM _____

LEPSY _____ OTHER _____

X _____ SCARLET FEVER _____ SMALL-POX _____

A _____ DYSENTERY _____ JAUNDICE _____ BOILS _____

DISEASE _____ HYPERTENSION _____ DIABETES _____

S _____ NEPHRITIS _____ OPERATIONS _____

ON _____ PAIN _____ L.M.P. _____

REN _____ STERILITY _____

_____ TEA _____ MEALS _____ WATER _____

SLEEP _____ BOWEL MOVEMENTS _____ EXERCISE _____ AMUSEMENTS _____

RICHARD K. RICKS, M.D., F.A.C.S.
THORACIC & CARDIOVASCULAR SURGERY

900 MEDICAL CENTER PROF. BLDG.
AND
~~1414 MEMORIAL PROF. BLDG.~~
HOUSTON, TEXAS

TELEPHONE 526-5211
AREA CODE 713

PRESENT AILMENT: _____

PHYSICAL EXAMINATION: TEMP. _____ PULSE _____ RESP. _____

B. P. _____ HT. _____ WT. _____ GENERAL APPEARANCE _____

SKIN _____ MUCOUS MEMBRANE _____

EYES: VISION _____ PUPIL _____ FUNDUS _____

EARS _____

NOSE: _____

THROAT: _____ PHARYNX _____ TONSILS _____

CHEST: _____ BREASTS _____

HEART: _____

LUNGS: _____

ABDOMEN: _____

GENITALIA: _____

RECTUM: _____

VAGINA: _____

EXTREMITIES: _____

LYMPH NODES: NECK _____ AXILLA _____ INGUINAL _____ ABDOMINAL _____

REFLEXES: _____

REMARKS: _____

SYMBOLS: V NORMAL, _____ ABNORMAL (UNDERLINE WORD;
DEGREE OF ABNORMALITY: X XX XXX

LABORATORY FINDINGS:
(Urine - Blood - Sputum - Smears - Exudates Transudates - Feces - Gastric Contents Wassermann - Kahn - Chemistry - Pregnancy Tests - X-Ray - Fluoroscopy - Schick - Dick Etc.)

Date	

HISTACOUNT® FORM NO. 403 PROFESSIONAL PRINTING COMPANY, INC., MELVILLE, L. I., N. Y.

5-7

DIAGNOSIS: American Income Life Insurance
Filed [illegible] 1 & [illegible] 1

TREATMENT:

DATE			SUBSEQUENT VISITS AND FINDINGS
MO.	DAY	YR.	

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MILTON M. SELF, M. D., F.A.C.S.
3155 STAGG DRIVE, SUITE 215
BEAUMONT, TEXAS 77701

Dear Doctor:

Enclosed is a copy of the pathological report from surgery performed on your patient, whom you referred to me.

In addition, may I take this opportunity to thank you for this referral.

Sincerely yours,

Milton M. Self, M. D., F. A. C. S.

MMS:kc

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St. Elizabeth Hospital

PATHOLOGICAL REPORT

S-69-510

DATE 2-5-69 ROOM 535

NAME Borel, Mr. Clarence DR. M. M. Self

SPECIMEN SOURCE: Pleural Fluid

GROSS DESCRIPTION:

MICROSECTION: Scattered mesothelial cells and macrophages are found. Within the cell block there are several clumps of cells which are atypical. Some of these form rosettes but these could be papillary projections of mesothelium from the pleura. A few other clumps of cells are loosely associated with each other and these have more atypical nuclei. They must be considered as suspicious.

DIAGNOSIS: Chest Fluid With Atypical Cells, Possibly Malignant

PATHOLOGIST

LAS—1

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St. Elizabeth Hospital

S-69-528

PATHOLOGICAL REPORT

DATE 2-7-69 ROOM 535

NAME Borel, Mr. Clarence DR. M. M. Self

~~SPECIMEN SOURCED~~

Source of Smear: Sputum

GROSS DESCRIPTION:

MICROSECTION: Large numbers of squamous epithelial cells are represented, but only a few pigment laden macrophages. Most of the material appears to be from the oral cavity. A few of the squamous epithelial cells have slightly enlarged nuclei but the changes are not of sufficient degree to indicate a malignant process.

DIAGNOSIS: Sputum With Atypical Cells, Probably Not Malignant

PATHOLOGIST

LAB—1

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St. Elizabeth Hospital

C-69-581

PATHOLOGICAL REPORT

DATE 2-10-69 ROOM 535

NAME Borel, Mr. Clarence DR. H. M. Self

SPECIMEN SOURCE: Sputum

GROSS DESCRIPTION:

MICROSECTION: These smears are composed of several types of cells. There are some superficial squamous epithelial cells from the upper respiratory tract. There are aslo considerable numbers of macrophages containing pigment indicating that some of this material is coming from deep in the tract. I can not recognize atypical epithelial cells.

DIAGNOSIS: Sputum Negative For Malignant Cells

PATHOLOGIST

LAB—1

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St. Elizabeth Hospital

PATHOLOGICAL REPORT

S-69-620

DATE 2-12-69 ROOM 535

NAME Borel, Mr. Clarence DR. M. M. Self

SPECIMEN SOURCE: Scalene Node
Biopsy, Right Lung
Bronchial Washings, Bilateral

GROSS DESCRIPTION: This specimen consists of a mass of what appears to be fatty tissue measuring 1.3 x .7 x .4 cm.

MICROSECTION: The biopsy from the right side is composed of alveoli and a few bronchioles. There is some atelectasis but the tissue is not otherwise remarkable. The secretions from the right side include some ciliated columnar cells as well as some basal cells. There are not many inflammatory cells. The secretions from the left side are composed of greater numbers than those on the right. The are similar in type however. The scalene nodes show some reticulum hyperplasia. They are not otherwise remarkable.

DIAGNOSIS:
Bronchial Secretions Negative For Malignant Cells
Biopsy of Right Lung
Reticulum Hyperplasia of Scalene Lymph Nodes

PATHOLOGIST

LAB—1

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