IN THE DISTRICT COURT OF THE UNITED STATES

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SEP 21 1970
JAMES R. COONEY, CLERK
BY DEPUTY Virginia R. Sens

SAMUEL R. POTTER V. FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.	)	CIVIL ACTION NO. 6329
CLARENCE BOREL V. FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.	)	CIVIL ACTION NO. 6449
J. J. CRAWFORD V. FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.	)	CIVIL ACTION NO. 6492

ANSWERS OF THE DEFENDANT, OWENS-CORNING FIBERGLAS CORPORATION, TO INTERROGATORIES PROPOUNDED BY PLAINTIFFS

TO THE PLAINTIFFS, SAMUEL R. POTTER, CLARENCE BOREL AND J. J. CRAWFORD, AND WARD STEPHENSON, STEPHENSON BUILDING, ORANGE, TEXAS, THEIR ATTORNEY OF RECORD:

Defendant, Owens-Corning Fiberglas Corporation, in response to interrogatories propounded under Rule 33, Federal Rules of Civil Procedure, served upon defendant's counsel on August 22, 1970, files this its answers to such interrogatories, such answers to each interrogatory bearing the same number and letter as the request.

INTERROGATORY NO. ONE: This defendant has no "so-called threshold limits" of its own for any product it manufactures or sells. This defendant's only knowledge of "threshold limits" are those established annually by the American Conference of Governmental Industrial Hygenists.

INTERROGATORY NO. TWO: See answer to No. One.

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INTERROGATORY NO. THREE: See answer to No. One.

INTERROGATORY NO. FOUR: See answer to No. One.

INTERROGATORY NO. FIVE: No.

INTERROGATORY NO. SIX: No answer required.

INTERROGATORY NO. SEVEN: For the determination of a threshold level for any particular substance this defendant would utilize information published annually by the American Conference of Governmental Industrial Hygenists.

DATED this 18th day of September, 1970.

KING, SHARFSTEIN & RIENSTRA

BY: Dale Dowell
707 Beaumont Savings Building
Beaumont, Texas 77701
ATTORNEYS FOR DEFENDANT,
OWENS-CORNING FIBERGLAS
CORPORATION

THE STATE OF TEXAS X
X
COUNTY OF JEFFERSON X

BEFORE ME, the undersigned authority, on this day personally appeared Dale Dowell, attorney of record for the defendant in the above styled and numbered actions, duly authorized to make this affidavit, and having been duly sworn, upon his oath states that the answers and statements contained in the foregoing answers to interrogatories are true and correct.

Dale Dowell

SWORN TO AND SUBSCRIBED BEFORE ME by the said Dale Dowell this the 18th day of September, A.D. 1970.

Carolyn Bartley
NOTARY PUBLIC, JEFFERSON COUNTY, TEXAS.

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CERTIFICATE OF SERVICE

I, Dale Dowell, attorney of record for the defendant, Owens-Corning Fiberglas Corporation, in the above styled and numbered action, do hereby certify that a true and c orrect copy of the above and foregoing answers to interrogatories was on this the 18th day of September, 1970, served upon the plaintiffs by depositing the same in the United States Mail, postage prepaid, addressed to Mr. Ward Stephenson, Stephenson Building, Orange, Texas, attorney of record for the plaintiffs; and, also, true copies of said answers to interrogatories were on this the 18th day of September, 1970, served upon all other defendants in these actions by mailing copies of same to their attorneys at their respective addresses.

Dale Dowell

ATTORNEY FOR DEFENDANT, OWENS-CORNING FIBERGLAS CORPORATION

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