IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SEP 23 1970
JAMES R. COONEY, CLERK
BY DEPUTY Virginia R. Sims

SAMUEL R. POTTER	§	
	§	
VS.	§	CIVIL ACTION NO. 6329
	§	
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL	§	

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

ANSWERS OF DEFENDANT, STANDARD ASBESTOS MANUFACTURING & INSULATING COMPANY TO INTERROGATORIES PROPOUNDED BY PLAINTIFFS

COMES NOW the defendant, Standard Asbestos Manufacturing & Insulating Company, and makes the following replies to the interrogatories heretofore propounded by the plaintiffs in the above cases.

1. This company has no "threshold limits". Presumably, reference is made to material published through the American Conference of Governmental Industrial Hygenists.

2. Not applicable. See answer to Interrogatory No. 1.

3. Not applicable. See answer to Interrogatory No. 1.

4. Not applicable. See answer to Interrogatory No. 1.

5. No.

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6. Not applicable.

7. Not applicable. See answer to Interrogatory No. 1 above.

Respectfully submitted,

MEHAFFY, WEBER, KEITH & GONSOULIN
Attorneys for Defendant, Standard Asbestos Manufacturing & Insulating Co.

By _____
Of Counsel

1400 San Jacinto Building

Beaumont, Texas

THE STATE OF TEXAS §

COUNTY OF JEFFERSON §

JAMES W. MEHAFFY, being by me first duly sworn, upon his oath deposes and says that he is one of the attorneys of record for the defendant named above and that the foregoing answers to interrogatories are true and correct.

_____
JAMES W. MEHAFFY

SWORN TO AND SUBSCRIBED before me by the said James W. Mehaffy, on this the 21st day of September, 1970, to certify which witness my hand and seal of office.

_____
NOTARY PUBLIC in and for
Jefferson County, Texas

I certify that a copy of the foregoing answers to interrogatories was served upon Ward Stephenson, Attorney of Record for the Plaintiffs, Stephenson Building, Orange, Texas, by depositing the same in the United States Mails, properly addressed to him, postage pre-paid, and a copy has likewise been forwarded to all other counsel of record.

_____
James W. Mehaffy

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