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
NOV 25 1970
JAMES R. COONEY, CLERK
BY DEPUTY

CLARENCE BOREL

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

CIVIL ACTION NO. 6449

ANSWER OF DEFENDANT, JOHNS-MANVILLE PRODUCTS CORPORATION IN COMPLIANCE WITH ORDER ON PLAINTIFF'S MOTION FOR DISCOVERY

COMES NOW, the Defendant, Johns-Manville Products Corporation, and in response to the Order of this Court, files this, its answer and reply to Plaintiff's Motion for Discovery.

1.

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

2.

This Defendant has no medical research department. It does have a scientific research department and the person in charge is Dr. F. L. Pundsack and his business address is: Johns-Manville Products Corporation, Post Office Box 159, Manville, New Jersey, 08835.

3.

The following respirators approved under the U. S. Bureau of Mines Schedule 21 or 21-B will materially reduce, or completely eliminate the inhalation of asbestos dust and fibres if properly used by exposed personnel:

470

Published by AsbestosClaims.Law
asbestosclaims.law/library/10186/1

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 this the 25th day of November, 1970.

GORDON R. PATE

Mr. Ward Stephenson
Mr. George E. Duncan
Mr. W. N. Arnold, Jr.
Mr. Ben L. Reynolds
Mr. Robert E. Barnes
Mr. Dale Dowell
Mr. George A. Weller
Mr. James W. Mehaffy, Sr.
Mr. Charles S. Pipkin
Mr. Frank Bean
Mr. Gerald P. Coley

Published by AsbestosClaims.Law
asbestosclaims.law/library/10186/2

GORDON R. PATE
ATTORNEY AT LAW
1119 Beaumont Savings Building
BEAUMONT, TEXAS 77701

Area Code 713
Telephone TErminal 8-6578

November 24, 1970

Mr. Ward Stephenson
STEPHENSON & THOMPSON
Stephenson Building
Orange, Texas

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

Dear Ward:

I want to be sure that I have complied with Judge Fisher's Order for Discovery in the above matter.

On behalf of Johns-Manville Products Corporation, I have previously furnished you with samples of products containing asbestos that are used in insulating work together with the available sales literature pertaining to products containing asbestos used in insulating work.

I would appreciate your advising me, after considering the attached Answer to the Motion together with the information which I have previously furnished you, if there is anything remaining to be produced in compliance with the Order of the Court.

Yours very truly,

GORDON R. PATE

GRP:jm

Published by AsbestosClaims.Law
asbestosclaims.law/library/10186/3

CIVIL ACTION NO. 6449

CLARENCE BOREL

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

ANSWER OF DEFENDANT, JOHNS-MANVILLE PRODUCTS CORPORATION IN COMPLIANCE WITH ORDER ON PLAINTIFF'S MOTION FOR DISCOVERY

IN THE DISTRICT COURT OF THE

UNITED STATES FOR THE EASTERN

DISTRICT OF TEXAS, BEAUMONT

DIVISION

GORDON R. PATE
ATTORNEY AT LAW
1119 BEAUMONT SAVINGS BUILDING
BEAUMONT, TEXAS 77701

The Borel v. Fibreboard Case File (1969-1972), Answers to interrogatories regarding order
ACL Doc 10186 · Page 4 of 4
Published by AsbestosClaims.Law
asbestosclaims.law/library/10186/4