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

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 16 1970
JAMES R. COONEY, CLERK
BY DEPUTY Virginia R. Lewis

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	§	
J. J. CRAWFORD	§	
VS.	§	CIVIL ACTION NO. 6492
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL	§	

MOTION IN RE: THE FILING OF DEPOSITIONS TAKEN
INTERROGATORIES AND ANSWERS THERETO
REQUEST FOR ADMISSIONS OF FACT AND ANSWERS THERETO
SAMPLES OF PRODUCTS AND LITERATURE

TO THE HONORABLE JUDGE OF SAID COURT:

Your undersigned Movants, being Plaintiffs and some of the Defendants in each of the above causes, respectfully show the Court that, while it is possible to file copies of all Depositions taken, Interrogatories and Answers thereto, Request for Admissions of Fact and Answers thereto, Samples of Products and Literature in each of the above causes, that it would be at considerable expense which can be avoided if a common file were to be created in which only one (1) copy of each Deposition taken, one (1) copy of each Request for Admissions of Fact and Answers thereto, one (1) copy of each set of Interrogatories and Answers thereto, one (1) sample of each product and one (1) copy of all Literature would be filed with the Clerk endorsing thereon the style and number of all three (3) causes;

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WHEREFORE, Movants pray that the Court direct the Clerk in filing Depositions taken, Interrogatories and Answers thereto, Request for Admissions of Fact and Answers thereto, samples of products and literature, that said Clerk endorse thereon the style and number of all three (3) causes and order that when so filed, each Deposition, all Interrogatories and Answers thereto, all Request for admissions of Fact and Answers thereto and all samples of products and literature for all purposes shall be considered to be and shall be considered filed in each of said three (3) causes and a part of the record thereof available to the parties in each cause the same as if same were placed among the papers of each cause; that Movants, when filing the Depositions, Interrogatories and Answers thereto, Request for Admissions of Fact and Answers thereto, samples of Prodcuts and literature, shall give separate written Notice thereof to the respective attorneys for each of said parties in each of said causes.

STIPULATED and AGREED to this 4th day of December, 1970.

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Orange, Texas
Attorney for Plaintiffs

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Attorney for Defendant, Standard
Asbestos Manufacturing and Insulating
Company

(See proviso on page 4)

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The foregoing stipulation and the signatures affixed thereto shall not in any way be construed to mean that evidence collected or testimony taken in cases in which one or more of the particular Defendants are not parties can be used in any way against such Defendants.

Ben L Reynolds

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Attorney for Defendant Eagle-
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Frank E Bean

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J. W. Mulloy
atty for defendant
Standard Asbestos
& Mfg Co. (not a
party to suit)

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The Borel v. Fibreboard Case File (1969-1972), Motion for a common file of interrogatories and depositions
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CIVIL ACTION NO. 6329
CIVIL ACTION NO. 6449
CIVIL ACTION NO. 6492

SAMUEL R. POTTER
CLARENCE BOREL
J. J. CRAWFORD

VS.

FIBREBOARD PAPER PRODUCTS
CORPORATION, ET AL

MOTION IN RE: THE FILING OF DEPOSITIONS TAKEN, INTERROGATORIES AND ANSWERS THERETO, REQUEST FOR ADMISSIONS OF FACT AND ANSWERS THERETO, SAMPLES OF PRODUCTS AND LITERATURE

IN THE UNITED STATES DISTRICT

COURT FOR THE EASTERN DISTRICT

OF TEXAS - BEAUMONT DIVISION

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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

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

MEMORANDUM BRIEF IN BEHALF OF DEFENDANTS, FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 17 1970
JAMES R. COONEY CLERK
BY DEPUTY Margaret Turner

PAGE KEETON, OF COUNSEL
2500 RED RIVER
AUSTIN, TEXAS 78705

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