FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

JAN 14 1971

JAMES R. COONEY, CLERK
BY DEPUTY

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: ALL DEFENDANTS AND INTERVENOR IN THE ABOVE STYLED AND NUMBERED CAUSE:

Gentlemen: Please take notice that the deposition of Dr. Luis E. Mateo, of Memorial Baptist Hospital, in Houston, Texas, will be taken on behalf of the plaintiffs upon certain written interrogatories, of which a copy is herewith served upon you, and such cross-interrogatories as may be served upon plaintiffs herein, before Dahl & Reed, Court Reporters, Houston First Savings Building, Houston, Texas 77002.

STEPHENSON AND THOMPSON

By _____
Attorneys for Plaintiffs
Stephenson Building
Orange, Texas 77630

1075


Published by AsbestosClaims.Law
asbestosclaims.law/library/10226/1

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 | : | |

DIRECT INTERROGATORIES TO BE PROPOUNDED TO DR. LUIS E. MATEO, HOUSTON, TEXAS

1.

Please state your name, residence and place of business.

2.

Please state your profession.

3.

Please state how long you have been engaged in the practice of such profession.

4.

Please state where you received your preliminary training.

5.

Please state where you received your intern training.

6.

Please state what additional training you have had.

7.

Please state whether or not your license to practice medicine is on record in Harris County, Texas.

8.

Do you practice medicine as a full-time occupation?

9.

Are you associated with any clinic, medical group or hospital? If so, please state the name.

10.

Do you belong to any professional society or group? If so, please state which ones.

1076


Published by AsbestosClaims.Law
asbestosclaims.law/library/10226/2

11.

Do you practice in any field of medical specialty? If so, please state in which specialty you engage.

12.

If you have had any specialized medical training, please state what it was and where such specialized medical training was taken.

13.

For the benefit of the jury, please state your age and the number of years you have been actively engaged in the practice of medicine.

14.

Please state where you are presently residing and practicing medicine.

15.

Please state whether or not, in the performance of your duties, you ever had occasion to make any studies to determine whether or not Clarence Borel had cancer or whether he had asbestosis, or both.

16.

If so, please state the date or dates that these studies were made, and what your studies consisted of.

17.

Please set forth in detail copies of all your reports concerning Clarence Borel and your findings on this patient, basing your answers upon reasonable medical probability.

STEPHENSON AND THOMPSON

By Ward Stephenson

Ward Stephenson
Stephenson Building
Orange, Texas 77630

ATTORNEYS FOR PLAINTIFFS

1077


Published by AsbestosClaims.Law
asbestosclaims.law/library/10226/3

POTTER
BOREL
CRAWFORD

## CERTIFICATE OF SERVICE BY MAIL

I, Ward Stephenson, hereby certify that a true and correct copy of the foregoing instrument was on this the 13th day of January, 1971, mailed to the following named attorneys:

Mr. George E. Duncan
Attorney at Law
P. O. Box 3708
Beaumont, Texas 77704
Attorney for Defendant
PITTSBURGH CORNING CORP.

Mr. W. N. Arnold, Jr.
Attorney at Law
Fulbright, Crooker, Freeman,
Bates & Jaworski
Bank of the Southwest Bldg.
Houston, Texas 77002
Attorney for Defendant
ARMSTRONG CORK COMPANY

Mr. W. N. Arnold, Jr.
Attorney at Law
Fulbright, Crooker, Freeman,
Bates & Jaworski
Bank of the Southwest Bldg.
Houston, Texas 77002

Mr. Robert E. Barnes
Attorney at Law
P. O. Box 5098
Beaumont, Texas 77706
Attorney for Defendant
RUBEROID COMPANY, DIVISION
OF GAF CORPORATION

Mr. Charles S. Pipkin
Attorney at Law
P. O. Box 1632
Beaumont, Texas 77704
Attorney for Defendant
COMBUSTION ENGINEERING, INC.

Mr. Dale Dowell
Attorney at Law
707 Beaumont Savings Bldg.
Beaumont, Texas 77701
Attorney for Defendant
OWENS-CORNING FIBERGLAS
CORPORATION

Mr. George A. Weller
Attorney at Law
P. O. Box 350
Beaumont, Texas 77704
Attorney for Defendant
FIBREBOARD PAPER PRODUCTS
CORPORATION

Mr. Gerald P. Coley
Attorney at Law
Vinson, Elkins, Searls & Connally
First City National Bank Bldg.
Houston, Texas 77002
Attorney for Defendant
UNARCO INDUSTRIES, INC.

Mr. James W. Mehaffy
Attorney at Law
San Jacinto Building
Beaumont, Texas 77701
Attorney for Defendant
STANDARD ASBESTOS MANUFACTURING
AND INSULATING COMPANY

Mr. Ben L. Reynolds
Attorney at Law
Royston, Rayzor and Cook
877 San Jacinto Building
Houston, Texas 77002
Attorney for Defendant
EAGLE-PICHER INDUSTRIES, INC.

Mr. Gordon R. Pate
Attorney at Law
1119 Beaumont Savings Bldg.
Beaumont, Texas 77701
Attorney for Defendant
JOHNS-MANVILLE PRODUCTS
CORPORATION

Mr. John Tucker
Attorney at Law
Beaumont Savings Building
Beaumont, Texas 77701
Attorney for Defendant
JOHNS-MANVILLE PRODUCTS
CORPORATION

Mr. Frank E. Bean
Attorney at Law
Room 2010, 500 Jefferson Street
Houston, Texas 77002
Attorney for Defendant
ARMSTRONG CORK COMPANY

Mr. George E. Murphy
Attorney at Law
615 San Jacinto Building
Beaumont, Texas 77701
Attorney for Intervenors

Ward Stephenson

WARD STEPHENSON

1078


Published by AsbestosClaims.Law
asbestosclaims.law/library/10226/4