United States of America | ss:
DISTRICT OF NEW JERSEY

The President of the United States of America

To

Johns-Manville Corporation

You are summoned to answer the annexed complaint of

ANNA PIRSKOWSKI

in an action at law in the District Court of the United States for the District of New Jersey. And take notice that unless you file your answer to said complaint with the Clerk of the District Court of the United States, for the District of New Jersey, at Trenton, within twenty days after service upon you of this writ and the annexed complaint, the plaintiff may proceed in the suit and judgment may be entered against you.

Witness the Honorable WILLIAM N. RUNYON ~~JOHN RELSTAB~~, Judge of said Court, at Trenton, this 8th day of May A. D. nineteen hundred and twentynine.

George P. Cranmer Clerk.

By L. A. McGuinty Deputy.

CRMC-Motley1000-Subj-003661

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY.

ANNA PIRSKOWSKI, :

Plaintiff, :

-vs- : ACTION AT LAW

JOHNS-MANVILLE CO.P., : C O M P L A I N T.

Defendant. :

The plaintiff, formerly a resident of Somerville, New Jersey, and now residing in Oil City, Pennsylvania, complains of the above named defendant a corporation, resident at Manville, New Jersey, as follows:-

1. The plaintiff was in the employ of the defendant in Manville, New Jersey, at its plant, in the year 1922 and for some time prior thereto.

2. That the said plaintiff was at that time an infant named Anna Urbanick, in the employ of the defendant who was engaged in the manufacture of asbestos, and that particles of said asbestos and other dangerous articles used in its business of manufacture as aforesaid was inhaled by her, so that she became diseased, sick and poisoned, and that the same permeated her system, particularly her lungs, and that her body became infected and weakened so as to cause her to suffer permanently with a malignant disease.

3. The negligence of the defendant complained of is as follows:-

(a) In failing to provide the plaintiff with a safe place of work.

(b) In failing to provide the plaintiff with masks or other appliance or safe guards in said work.

(c) In failing to provide a proper ventilating system at its plant.

CRMC-Motley1000-Subj-003662

4. That by reason of her suffering, illness and diseased condition, due to the negligence of the defendant as aforesaid, the plaintiff was obliged to quit her employment in the year 1922, and will be disabled throughout her lifetime. She has, since leaving her position, been obliged to spend a large sum of money for medical expense and will suffer a loss in wages , all to her damage in the sum of $50,000.00.

The plaintiff demands the sum of $50,000.00 as damages from the defendant.

Samuel Greenstone.
ATTORNEY FOR PLAINTIFF

CRMC-Motley1000-Subj-003663

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY.

ANNA PIRSKOWSKI,

Plaintiff,

-vs-

JOHNS-MANVILLE CORP.,

Defendant.

ACTION AT LAW

SUMMONS AND COMPLAINT.

SAMUEL GREENSTONE,
Attorney for Plaintiff,
972 Broad Street,
Newark, N.J.

FILED

MAY 10

412

CRMC-Motley1000-Subj-003664

GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

To all to whom these presents shall come, Greeting:

By virtue of the authority vested in me by the Administrator of General Services, I certify on his behalf, under the seal of the National Archives of the United States, that the attached reproduction(s) is a true and correct copy of documents in his custody.

(seal)

SIGNATURE: Anthony J Fantozzi

NAME: Anthony J Fantozzi

DATE: 11/8/80

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY:
Federal Archives and Records Center
Building 22 - MOT - Bayonne
Bayonne, N.J. 07002
2NCM

GSA FORM APR 68 6791

CRMC-Motley1000-Subj-003665

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI,

Plaintiff,

-vs-

JOHNS-MANVILLE CORPORATION,

Defendant.

Action at Law

A N S W E R

Hobart & Minard, Esqs.,
Attorneys of Defendant,
24 Branford Place,
Newark, N. J.

FILED

MAY 27 1929

AT 9 O'CLOCK A. M.

GEORGE T. CRANMER, Clerk.

CRMC-Motley1000-Subj-003666

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI, :

Plaintiff, :

-vs- : Action at Law

JOHNS-MANVILLE CORPORATION, : A N S W E R

Defendant. :

Defendant, a corporation of the State of New York, having its principal residence in New Jersey at Manville, says that:

FIRST DEFENSE

It denies the truth of the matters contained in the complaint.

SECOND DEFENSE

Plaintiff's action is barred because it was not commenced and instituted within two years next after the alleged cause of action accrued.

THIRD DEFENSE

Plaintiff's action is barred because it was not commenced and instituted within two years after the plaintiff's coming to or being of full age.

Hobert & Minard
Attorneys of Defendant.

CRMC-Motley1000-Subj-003667

GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

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(seal)

SIGNATURE

Anthony J Fantozzi

NAME: Anthony J Fantozzi

DATE: 11/3/80

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY

Federal Archives and Records Center
Building 22 - MOT - Bayonne
Bayonne, N.J. 07002

2NCN

GSA FORM APR 68 6791

CRMC-Motley1000-Subj-003668

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI,

Plaintiff,

-vs-

JOHNS-MANVILLE CORPORATION,

Defendant.

DEMAND FOR SECURITY FOR COSTS

Hobart & Minard,
Attys. for Def't.,
24 Branford Pl.,
Newark, N.J.

Service admitted
July 13 1929
Samuel Greenstein
Atty for Pl'ff

FILED
JUL 13 1929
AT 8 O'CLOCK
GEORGE T. CRANE

CRMC-Motley1000-Subj-003669

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI,	:	
Plaintiff,	:	Action at Law.
-vs-	:	DEMAND FOR SECURITY FOR COSTS
JOHNS-MANVILLE CORPORATION,	:	
Defendant.	:	
	:	

TO - SAMUEL GREENSTONE, ESQ.,

Attorney for Plaintiff.

S I R

The defendant demands security for costs in the above entitled suit, the plaintiff being a non-resident.

DATED: July 13,1929.

Yours truly,

Hobart & Menard

Attorneys for Defendant.

CRMC-Motley1000-Subj-003670

GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

To all to whom these presents shall come, Greeting:

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(seal)

SIGNATURE

Anthony J Fantozzi

NAME: Anthony J Fantozzi | DATE: 11/3/80

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY

General Archives and Records Center
Building 22 - MOT - Bayonne
Bayonne, N.J. 07002
2NCN

GSA FORM APR 68 6791

CRMC-Motley1000-Subj-003671

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW JERSEY.

- - - - - - - - - - - - - - - - - -

ANNA PIRSKOWSKI,

Plaintiff,

-vs-

JOHNS-MANVILLE CORPORATION,

Defendant.

- - - - - - - - - - - - - - - - - -

ACTION AT LAW

R E P L Y

- - - - - - - - - - - - - - - - - -

SAMUEL GREENSTONE,
Attorney for Plaintiff,
972 Broad Street,
Newark, N.J.

JUL 15 1929

Consent is hereby given to the filing of the within reply as within time, this 13th day of July, 1929.

Holcombe & Menard

Attorney of Defendant.

CRMC-Motley1000-Subj-003672

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI, :

Plaintiff, :

-vs- : ACTION AT LAW

JOHNS-MANVILLE CORPORATION, : R E P L Y

Defendant. :

Plaintiff, Anna Pirskowski, for reply to the answer of the defendant, Johns-Manville Corporation, says that:-

1. She denies all the affirmative defenses alleged in the answer of the defendant Johns-Manville Corporation.

Samuel Greenstone

ATTORNEY FOR PLAINTIFF.

CRMC-Motley1000-Subj-003673

GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

To all to whom these presents shall come, Greeting:

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(seal)

SIGNATURE

Anthony J Fantozzi

NAME: Anthony J Fantozzi | DATE: 11/3/80

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY

Federal Archives and Records Center
Building 22 - MOT - Bayonne
Bayonne, N.J. 07002

GSA FORM APR 68 6791

CRMC-Motley1000-Subj-003674

UNITED STATES DISTRICT Court
FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI,

Plaintiff

vs.

JOHNS-MANVILLE CORPORATION,

Defendant

Action at Law.
ORDER FOR DISCONTINUANCE.

1807

The above entitled cause having been settled between the parties thereto;

It is ORDERED, that the same be, and it is hereby discontinued, without costs to either party as against the other.

George T. Gramm
Clerk
By Edward A. Cahill
Deputy

Entered June 13, *19* 34

On motion of
Hobart & Menard
Attorneys of defendant

Consent is hereby given to the making and entering of the above order.

Arnold J. Stenstrom
Attorney of Plaintiff

CRMC-Motley1000-Subj-003675

1897. Nw

LAW

ANNA PIRSKOWSKI,

Plaintiff,

vs

JOHNS-MANVILLE COPPORATION

Defendant.

Action at Law.

Order for Discontinuance

HOBART & MINARD
ATTORNEYS FOR DEFENDANT
1180 RAYMOND BOULEVARD
NEWARK, N J.

FILED
JUN 13 1934
AT 9 O'CLOCK A. M.
GEORGE T. CRANMER, CLERK.

CRMC-Motley1000-Subj-003676

GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

To all to whom these presents shall come, Greeting:

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(seal)

SIGNATURE: Anthony J Fantozzi

NAME: Anthony J Fantozzi | DATE: 11/3/80

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY:
Federal Archives and Records Center
Building 22 - MOT - Bayonne
Bayonne, N.J. 07002
2NCN

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CRMC-Motley1000-Subj-003677

Notice of Trial—All Law Co[illegible]—3

Blank Publishers, Perth Amboy, N. J.

UNITED STATES DISTRICT Court.
FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI,

Plaintiff,

vs.

JOHNS-MANVILLE CORPORATION, a corporation of the State of NewYork,

Defendant.

Action at law.

Notice of Trial.

SIR :—PLEASE TO TAKE NOTICE, that the trial of the issue joined in this cause will be moved before said Court, in the presence of such Judge or Justice thereof, as shall then be holding said Court, on the First *Tuesday of* April *A. D. 1931, at the* Lefcourte Bldg. *in* Newark *in and for the* District *of* New Jersey *at ten o'clock in the forenoon, or as soon thereafter as the said Court can attend to the same.*

Dated January 14th *A. D., 19* 31.

Samuel Greenstone
Attorney of Plaintiff.

Hobart & Minard

To _____ *Esq.,*
Attorney of Defendant.

CRMC-Motley1000-Subj-003678

L 1897

LAW

U. S. DISTRICT Court

FOR THE DIST. OF N. J.

ANNA PIRSKOWSKI,

Plaintiff;

-vs-

Action

JOHNS-MANVILLE CORPORATION,

Defendant. at law

Notice of Trial

Samuel Greenstein

Attorney for Plaintiff.

FILED

FEB 7 1931

AT 9 O'CLOCK A.M.

JOHN T. CRAMER, Clerk.

Service of the within Notice of Trial is hereby acknowledged this 5th *day of* February *A. D. 19* 31

Attorney for Defendant

CRMC-Motley1000-Subj-003679

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GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

To all to whom these presents shall come, Greeting:

By virtue of the authority vested in me by the Administrator of General Services, I certify on his behalf, under the seal of the National Archives of the United States, that the attached reproduction(s) is a true and correct copy of documents in his custody.

(seal)

SIGNATURE

NAME: Anthony J Fradozzi | DATE: 11/3/80

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY

Federal Archives and Records Center
Building 22 - MOT - Bayonne
Bayonne, N.J. 07002

GNCN

GSA FORM APR 68 6791

CRMC-Motley1000-Subj-003680

UNITED STATES DISTRICT COURT

DISTRICT OF NEWJERSEY

Anna Pirshowska :

VS. : No. L-1897

Johns-Manville Corp :

NOTICE OF FIXING PLACE FOR TRIAL.

Pursuant to Rule 12 I have fixed the place for the trial of the above case at Newark, N. J.

The next term of this court to be held at Newark, N. J. will commence the First Tuesday in April next and this case having been noticed for trial pursuant to said rule will be placed on the calendar. No notice of trial for subsequent terms will be necessary.

George T. Cranmer,
Clerk

By Charles S. Chevrier,

Deputy.

CRMC-Motley1000-Subj-003681

GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

To all to whom these presents shall come, Greeting:

By virtue of the authority vested in me by the Administrator of General Services, I certify on his behalf, under the seal of the National Archives of the United States, that the attached reproduction(s) is a true and correct copy of documents in his custody.

(seal)

SIGNATURE

NAME: Anthony J Fradozzi | DATE: 11/3/81

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY:
General Archives and Records Center
Building 22 - MOT - Bayonne
Bayonne, N.J. 07002
2NCN

GSA FORM AFR 68 6791

CRMC-Motley1000-Subj-003682

DAW L 1897 ✓
1897

U. S. DISTRICT Court

DISTRICT OF NEW JERSEY

ANNA PIRKOWSKI,

Plaintiff,

-vs-

JOHNS-MANVILLE COR-
PORATION, a corporation
of the State of New York,

Defendant.

Action at Law

FILED

MAY 12 1930

A

GEORGE

Notice of Trial

Samuel Greenstone.
Attorney for Plaintiff.

Service of the within Notice of Trial is hereby acknowledged this 28th *day of* May *A. D. 1930*

[illegible]
Attorney for Defendant.

Summons issue
[illegible]

CRMC-Motley1000-Subj-003683

Perth Amboy, N. J.

UNITED STATES DISTRICT Court.

FOR THE DISTRICT OF NEW JERSEY.

ANNA PIRSKOWSKI,

Plaintiff,

vs.

JOHNS-MANVILLE CORPORATION, a corporation of the State of New York,

Defendant.

Action at law

Notice of Trial.

SIR :—PLEASE TO TAKE NOTICE, that the trial of the issue joined in this cause will be moved before said Court, in the presence of such Judge or Justice thereof, as shall then be holding said Court, on the First *Tuesday of* November *A. D. 19* 30, *at the* 24 Commerce St., Newark *in and for the* District *of* New Jersey *at ten o'clock in the forenoon, or as soon thereafter as the said Court can attend to the same.*

Dated April 23d *A. D. 19*30.

Samuel Greenstone
Attorney of Plaintiff.

To Hobart & Minard *Esqs.,*
Attorneys of Defendant

CRMC-Motley1000-Subj-003684

GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

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By virtue of the authority vested in me by the Administrator of General Services, I certify on his behalf, under the seal of the National Archives of the United States, that the attached reproduction(s) is a true and correct copy of documents in his custody.

(seal)

SIGNATURE: Anthony J Fantozzi

NAME: Anthony J Fantozzi

DATE: 11/3/80

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY:
Federal Archives and Records Center
Building 22 - MOT - Bayonne
Bayonne, N.J. 07002
2NCN

GSA FORM APR 68 6791

CRMC-Motley1000-Subj-003685

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI,

Plaintiff,

-vs-

JOHNS-MANVILLE CORPORATION,

Defendant.

Action at Law.

ALENDUM TO ANSWER

Hobart & Minard

Attys. for Defendant

24 Branford Pl.

Newark, N.J.

FILED

NOV 2- 1929

4 o'clock P. M.

GEORGE T. CRANMER, Clerk

CRMC-Motley1000-Subj-003686

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI, :

Plaintiff, :

-vs- :

JOHNS-MANVILLE CORPORATION, :

Defendant. :

STIPULATION

It is hereby stipulated that the defendant may file an amendment to the answer setting up certain defenses in addition to those heretofore filed, in the form hereto attached; the reply heretofore filed by the plaintiff to the original answer to stand as the reply to said additional defenses.

DATED: October 30 1929.

Samuel Freeston
Attorney for Plaintiff

Attorneys for Defendant.

CRMC-Motley1000-Subj-003687

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ANNA PIRSKOWSKI, : Action at Law.

Plaintiff, :

-vs- : AMENDMENT TO ANSWER

JOHNS-MANVILLE CORPORATION, :

Defendant. :

:

Defendant files the following defenses in addition to those set forth in the original answer herein:

FOURTH DEFENSE

The injury and the disease alleged in the complaint were due to one of the risks of her employment assumed by the plaintiff as part of the terms of her contract of employment.

FIFTH DEFENSE

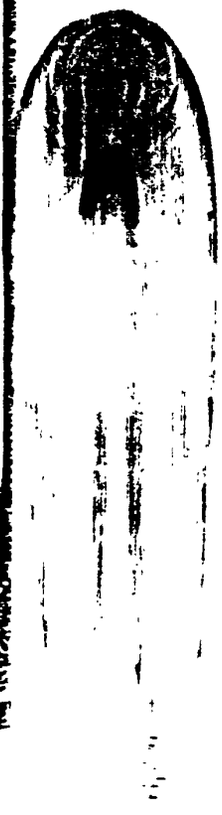
The injury and the disease alleged in the complaint were due to one of the risks of her employment assumed by the plaintiff as part of the terms of her contract of employment in that the plaintiff knew, or by the exercise of reasonable care on her part should have known, the alleged dangers of her employment.

SIXTH DEFENSE

The injury and the disease alleged in the complaint were caused by contributory negligence on the part of the plaintiff.

SEVENTH DEFENSE

The injury and the disease alleged in the complaint were caused by contributory negligence on the part of the plaintiff in that the plaintiff failed to exercise reasonable care to protect herself against the alleged dangers of her employment by using the mask and other appliances provided by the defendant for that purpose.



CRMC-Motley1000-Subj-003688

EIGHTH DEFENSE

The injury and the disease alleged in the complaint were due to negligence on the part of a fellow-servant of the plaintiff, in failing to warn and instruct the plaintif to use the mask and other appliances provided by the defendant for the purpose of protecting the plaintiff again the alleged dangers of her employment.

Hoben & Menard
Attorneys for Defendant.

CRMC-Motley1000-Subj-003689

THE STATE OF NEW JERSEY: TO JOHNS-MANVILLE CORPORATION, a corporation of the State of New York.

You are summoned to answer the annexed complaint of Pauline Lasin, administratrix ad prosequendum of the estate of John Lasin, deceased, in an action-at-law in the New Jersey Supreme Court.

Plaintiff,

(L.S.)

And Take Notice that unless you file your answer to said complaint with the Clerk of the New Jersey Supreme Court, at Trenton, New Jersey, within twenty days after the service upon you of this writ and the annexed complaint, the plaintiff may proceed in the suit and judgment may be entered against you.

WITNESS, Honorable William S. Gummere, Chief Justice of the Supreme Court, at Trenton, New Jersey, this 10th day of August, 1929.

Fred L. Bloodgood,
CLERK

Samuel Greenstone
Attorney for Plaintiff,

T. J. Flynn
Assistant Secretary.

CRMC-Motley1000-Subj-003690