IN THE DISTRICT COURT OF THE UNITED STATES

FOR THE NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION.

LOUIS PEREZ	)	
	)	
vs.	)	No. 43672
	)	
JOHNS-MANSVILLE PRODUCTS CORPORATION, a corp.	)	

P E T I T I O N

TO THE HONORABLE JUDGES OF THE DISTRICT COURT OF THE UNITED STATES, FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION:-

YOUR PETITIONER, LUIS PEREZ, respectfully represents unto the Court that he is the plaintiff in the above entitled cause and further that your petitioner was employed by the defendant for about sixteen (16) years, and that during his period of employment, his work brought him into daily contact with asbestos and cement dust; that your petitioner is now ill, and has been for some period of time, of a chest condition, and that he has been advised by several physicians that the said disease is known as pneumoconiosis, asbestosis with tuberculosis.

Your petitioner further respectfully represents that during the time of his employment that he earned a wage of $20.00 per week, which was his only means of livlihood, and that upon such salary, he suported his wife and himself; that on August 13th, 1933, he became ill of the chest condition hereinabove set forth, and that he has thereafter been unable to continue his duties and employment, and as a result theroof, he was discharged from the employment of the said defendant; that your petitioner is now wholly destitute and without means for medical care and attention and hospitalization.

Your petitioner further represents that he has been under the care of a physician and has been examined by several other reliable physicians who have advised that his physical condition

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is such that he will not now, or hereafter, be able to work.

Your petitioner further states that if the above entitled cause is placed upon the regular trial call, he will not be able physically, to submit to the ordeal of a trial at the time of his turn in the ordinary course of the trial calender; that he has been further advised by his physician that there is a liklihood that he will succomb to the disease before such case is reached for trial on the regular calender; that in that event, his then widow will be subjected to additional legal difficulties in establishing her right of action against the said defendant.

Your petitioner's testimony is materially necessary to properly establish the allegations set forth in your petitioner's complaint herein, and your petitioner therefore prays this honorable Court to advance the above entitled cause on trial call and set the said case for trial at an early date convenient to said Court.

Witness to mark: [illegible]

Luis (X) Perez
mark

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

LUIS PEREZ being first duly sworn upon oath deposes and says that he has read the above and foregoing petition by him subscribed; that he knows the contents therein contained and that the same is true in substance and in fact.

Luis (X) Perez
mark

SUBSCRIBED and SWORN to before me this 7th day of January, A. D., 1935.

Witness to mark:
[illegible]

[illegible]
Notary Public.

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