SOL ANDREWS

UNITED STATES OF AMERICA)
) SS
STATE OF ILLINOIS)

IN THE DISTRICT COURT OF THE UNITED STATES
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHARLES SAROUNAS	)	
	)	
VS -	)	GENERAL NO. 43500
	)	
JOHNS-MANVILLE CORPORATION, a corporation	)	AT LAW

AMENDED COMPLAINT

Now comes the plaintiff, CHARLES SAROUNAS, by his attorney, Sol Andrews, and by leave of court first had and obtained files this, his amendment to the complaint heretofore filed herein, as follows:

That sub-paragraph (a) and following of paragraph 7 of the complaint be changed to read as follows:

(a) Negligently failed to provide a reasonably safe place to work in, in this, that there were in and about said premises no proper suction fans or other reasonable apparatus provided for collecting the injurious dust in the air in the said room where plaintiff worked.

(b) Negligently failed to provide reasonable masks or respirators or other apparatus to be used or worn by said plaintiff, which would effectively prevent the plaintiff from inhaling the said dust caused to impregnate and float in the air in and about the said room, and which would effectively prevent him from contracting the diseases herein complained of.

(c) Negligently failed to warn plaintiff of the

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danger of contracting the said diseases, or to instruct the plaintiff as to how to avoid the said danger, which danger was one that the plaintiff did not have knowledge of nor could he reasonably be expected to know of or appreciate or anticipate from the nature of the work or process being carried on.

(d) Negligently ordered the plaintiff, or caused the plaintiff to be ordered, to go ahead with the work in spite of the danger, of which the defendant had knowledge or by the reasonable exercise of due care and caution should have had.

(e) Wilfully, wantonly and with conscious indifference to the health of the plaintiff, failed to furnish a reasonably safe place to work in, in that the defendant, knowing of the danger and having been given notice thereof, compelled plaintiff to go ahead with his work without protection.

(f) Wilfully, wantonly and with conscious indifference to the health and safety of the plaintiff and other employees, refused to provide masks or respirators or other reasonable apparatus to prevent plaintiff from inhaling the injurious dusts.

(g) Wilfully, wantonly and with conscious indifference to the health and safety of the plaintiff, and other employees, refused to warn plaintiff of the dangers.

Plaintiff asks judgment for Fifty Thousand Dollars, ($50,000.00).

Sol Andrews
Attorney for Plaintiff.

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