SOUTHERN DISTRICT OF MISSISSIPPI
FILED
MAR 18 1982
CLARENCE A. PIERCE, CLERK
DEPUTY
BY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

JAMES L. JACKSON — PLAINTIFF

VS. — CIVIL ACTION NO. S79-0211(N)

ARMSTRONG CORK COMPANY, et al. — DEFENDANTS

NOTICE OF FILING OF
SUMMARY EXHIBIT OF EXPOSURE DOCUMENTS

Pursuant to prior order of the Court, plaintiff files as Exhibit "A" his preliminary summary exhibit of exposure documents which, when complete, will be offered into evidence pursuant to Rule 1006, Federal Rules of Evidence.

This exhibit purports to demonstrate: (1) the vessels worked on by James L. Jackson during his employment at Ingalls as established by his own recollection and by time cards produced by Ingalls Shipbuilding Division of Litton Systems, Inc., to date; (2) asbestos-containing products manufactured by the defendants in this cause through common discovery; (3) the insulating subcontractor on the vessels on which James L. Jackson worked as established by the documents secured in this cause through common discovery.

The documents supporting this summary will be made available for review and inspection by opposing counsel upon request at mutually convenient times before trial.

All time cards for the periods worked by the plaintiff have not yet been produced by Ingalls or were not produced in sufficient time to add to this exhibit for filing today. To the extent that this exhibit is incomplete for that reason, it will be supplemented on or before March 21, 1982 or upon a reasonable time



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following receipt of additional time cards from Ingalls.

This summary exhibit does not purport to demonstrate those additional asbestos-containing products manufactured by these defendants which live testimony at trial will establish were installed on the vessels on which James L. Jackson worked, and plaintiff reserves the right to amend at trial this summary exhibit or its similar equivalent, to reflect those additional products.

DATED: March 17, 1982.

Respectfully submitted,

JAMES L. JACKSON, PLAINTIFF

BLATT & FALES
Post Office Box 365
Barnwell, South Carolina 29812

PATE & PETERS
Post Office Drawer 1308
Mobile, Alabama 36633

CUPIT & MAXEY
Post Office Box 22666
Jackson, Mississippi 39205
ATTORNEYS FOR PLAINTIFF

BY:
OF COUNSEL

CRMC-Motley1000-Subj-005026

HULL	SUBCONTRACTOR	PIPE		BLOCK		CEMENT		CLOTH		OTHER		SOURCE
461	Shook & Fletcher									marinite	JM	Hopeman Bros.
462	Shook & Fletcher									marinite	JM	Hopeman Bros.
463	Shook & Fletcher									marinite	JM	Hopeman Bros.
465										marinite	JM	Hopeman Bros.
468												
470										marinite	JM	Hopeman Bros.
471										marinite	JM	Hopeman Bros.
472										marinite	JM	Hopeman Bros.
473										marinite	JM	Hopeman Bros.
474										marinite	JM	Hopeman Bros.

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HULL	SUBCONTRACTOR	PIPE		BLOCK		CEMENT		CLOTH		OTHER		SOURCE
475										marinite	JM	Hopeman Bros.
476										marinite	JM	Hopeman Bros.
477										marinite	JM	Hopeman Bros.
478	Shook & Fletcher	thermobestos	JM	thermobestos	JM	352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
479	Shook & Fletcher	thermobestos	JM	thermobestos	JM	352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
480	Shook & Fletcher	thermobestos	JM	thermobestos	JM	352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
482										marinite	JM	Hopeman Bros.
483										marinite	JM	Hopeman Bros.
484										marinite	JM	Hopeman Bros.
485	Shook & Fletcher					450	JM					Hopeman Bros.
						352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher

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HULL	SUBCONTRACTOR	PIPE		BLOCK		CEMENT		CLOTH		OTHER		SOURCE
486	Shook & Fletcher					352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
487	Shook & Fletcher					352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
489	Shook & Fletcher	thermobestos	JM	thermobestos	JM	352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
						450	JM					Shook & Fletcher
490	Shook & Fletcher	thermobestos	JM	thermobestos	JM	450	JM					Shook & Fletcher
491	Shook & Fletcher	thermobestos	JM	thermobestos	JM	450	JM					Shook & Fletcher
492	Shook & Fletcher	thermobestos	JM	thermobestos	JM	450	JM					Shook & Fletcher
493	Shook & Fletcher	thermobestos	JM	thermobestos	JM	450	JM					Shook & Fletcher
495	Shook & Fletcher	thermobestos	JM	thermobestos	JM							Shook & Fletcher
496	Shook & Fletcher					450	JM					Shook & Fletcher

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HULL	SUBCONTRACTOR	PIPE		BLOCK		CEMENT		CLOTH		OTHER		SOURCE
497	Shook & Fletcher											
498	Shook & Fletcher											
499	Shook & Fletcher	thermobestos	JM	thermobestos	JM							Shook & Fletcher
576	Shook & Fletcher											
577	Shook & Fletcher											
580	Shook & Fletcher											
584	Shook & Fletcher											
585	Shook & Fletcher											
586	Shook & Fletcher											
587	Shook & Fletcher											

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LL	SUBCONTRACTOR	PIPE		BLOCK		CEMENT		CLOTH		OTHER		SOURCE
591												
593												
594												
597												
598												
.019	Shook & Fletcher	superex	JM	thermobestos	JM	352	JM					Shook & Fletcher
		thermobestos	JM	kaylo	OI	450	JM					Shook & Fletcher
020												
061												
064	Shook & Fletcher	kaylo	OI	kaylo	OI							Shook & Fletcher
		thermobestos	JM	thermobestos	JM							Shook & Fletcher

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HULL	SUBCONTRACTOR	PIPE		BLOCK		CEMENT		CLOTH		OTHER		SOURCE
1082	Shook & Fletcher	thermobestos	JM			superex 1900	JM					Shook & Fletcher
						450	JM					Shook & Fletcher
1095	Shook & Fletcher	thermobestos	JM	thermobestos	JM	301	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
1107	Badham	thermobestos	JM			450	JM	generic	RM			Badham
1110	Shook & Fletcher	thermobestos	JM	thermobestos	JM	301	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
						352	JM					Shook & Fletcher
1129	Shook & Fletcher									marinite	JM	Hopeman Bros.
1130	Shook & Fletcher									marinite	JM	Hopeman Bros.
1131	Shook & Fletcher									marinite	JM	Hopeman Bros.
1132	Shook & Fletcher									marinite	JM	Hopeman Bros.
1151	Badham					352	JM	generic	RM			Badham

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HULL	SUBCONTRACTOR	PIPE		BLOCK		CEMENT		CLOTH		OTHER		SOURCE
1156	Shook & Fletcher					450	JM					Shook & Fletcher
						302	JM					Shook & Fletcher
1157				thermobestos	JM					marinite	JM	Ingalls Shook & Fletcher
1158				thermobestos	JM					marinite	JM	Ingalls Shook & Fletcher
1159				thermobestos	JM					marinite	JM	Ingalls Hopeman Bros.
1160				thermobestos	JM					marinite	JM	Ingalls Hopeman Bros.
1162	Badham			thermobestos	JM	352	JM	generic	RM			Badham
1168	Shook & Fletcher					352	JM					Shook & Fletcher

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CERTIFICATE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Notice of Filing of Summary Exhibit of Exposure Documents, was mailed, postage prepaid, to Roy C. Williams, Esquire, Post Office Box 787, Pascagoula, Mississippi, 39567, attorney for Johns-Manville Sales Corporation; Walter Eppes, Esquire, Post Office Box 3311, Meridian, Mississippi, attorney for H. K. Porter Company; W. Swan Yerger, Esquire, 1030 Capital Towers, Jackson, Mississippi, 39201, attorney for Raybestos-Manhattan, Inc.; Richard L. Forman, Esquire, Post Office Box 22567, Jackson, Mississippi, 39205, attorney for Owens-Illinois, Inc.

This the 17th day of March, 1982.

DANNY E. CUPIT

CRMC-Motley1000-Subj-005034

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

JAMES L. JACKSON — PLAINTIFF

VS. — CIVIL ACTION NO. S79-0211(N)

ARMSTRONG CORK COMPANY, et al. — DEFENDANTS

NOTICE OF FILING OF SUPPLEMENTAL
SUMMARY EXHIBIT OF EXPOSURE DOCUMENTS

Pursuant to prior order of the Court, plaintiff files as Exhibit "A" his summary exhibit of exposure documents which will be offered into evidence pursuant to Rule 1006, Federal Rules of Evidence.

This exhibit purports to demonstrate: (1) the vessels worked on by James L. Jackson during his employment at Ingalls as established by his own recollection and by time cards produced by Ingalls Shipbuilding Division of Litton Systems, Inc., to date; (2) asbestos-containing products manufactured by the defendants in this cause through common discovery; (3) the insulating subcontractor on the vessels on which James L. Jackson worked as established by the documents secured in this cause through common discovery.

The documents supporting this summary will be made available for review and inspection by opposing counsel upon request at mutually convenient times before trial.

This summary exhibit does not purport to demonstrate those additional asbestos-containing products manufactured by these defendants which live testimony at trial will establish were installed on the vessels on which James L. Jackson worked, and

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plaintiff reserves the right to amend at trial this summary exhibit to reflect those additional products.

DATED: March 22, 1982.

Respectfully submitted,

JAMES L. JACKSON, PLAINTIFF

BLATT & FALES
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Barnwell, South Carolina 29812

PATE & PETERS
Post Office Drawer 1308
Mobile, Alabama 36633

CUPIT & MAXEY
Post Office Box 22666
Jackson, Mississippi 39205
ATTORNEYS FOR PLAINTIFF

BY: _____
OF COUNSEL

CERTIFICATE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Notice of Filing of Summary Exhibit of Exposure Documents, was mailed, postage prepaid, to Roy C. Williams, Esquire, Post Office Box 787, Pascagoula, Mississippi, 39567, attorney for Johns-Manville Sales Corporation; Walter Eppes, Esquire, Post Office Box 3311, Meridian, Mississippi, attorney for H. K. Porter Company; W. Swan Yerger, Esquire, 1030 Capital Towers, Jackson, Mississippi, 39201, attorney for Raybestos-Manhattan, Inc.; Richard L. Forman, Esquire, Post Office Box 22567, Jackson, Mississippi, 39205, attorney for Owens-Illinois, Inc.

This the 22nd day of March, 1982.

DANNY E. CUPIT

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HULL	SUBCONTRACTOR	PIPE	Def.	BLOCK	Def.	CEMENT	Def.	CLOTH	Def.	OTHER	Def.	SOURCE
461	Shook & Fletcher									marinite	JM	Hopeman Bros.
462	Shook & Fletcher									marinite	JM	Hopeman Bros.
463	Shook & Fletcher									marinite	JM	Hopeman Bros.
465										marinite	JM	Hopeman Bros.
468												
470										marinite	JM	Hopeman Bros.
471										marinite	JM	Hopeman Bros.
472										marinite	JM	Hopeman Bros.
473										marinite	JM	Hopeman Bros.
474										marinite	JM	Hopeman Bros.

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LL	SUBCONTRACTOR	PIPE	Def.	BLOCK	Def.	CEMENT	Def.	CLOTH	Def.	OTHER	Def.	SOURCE
475										marinite	JM	Hopeman Bros.
476										marinite	JM	Hopeman Bros.
477										marinite	JM	Hopeman Bros.
478	Shook & Fletcher	thermobestos	JM	thermobestos	JM	352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
479	Shook & Fletcher	thermobestos	JM	thermobestos	JM	352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
480	Shook & Fletcher	thermobestos	JM	thermobestos	JM	352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
482										marinite	JM	Hopeman Bros.
483										marinite	JM	Hopeman Bros.
484										marinite	JM	Hopeman Bros.
485	Shook & Fletcher					450	JM					Hopeman Bros. Hopeman Bros

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HULL	SUBCONTRACTOR	PIPE	Def.	BLOCK	Def.	CEMENT	Def.	CLOTH	Def.	OTHER	Def.	SOURCE
486	Shook & Fletcher					352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
487	Shook & Fletcher					352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
489	Shook & Fletcher	thermobestos	JM	thermobestos	JM	352	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
						450	JM					Shook & Fletcher
490	Shook & Fletcher	thermobestos	JM	thermobestos	JM	450	JM					Shook & Fletcher
491	Shook & Fletcher	thermobestos	JM	thermobestos	JM	450	JM					Shook & Fletcher
492	Shook & Fletcher	thermobestos	JM	thermobestos	JM	450	JM					Shook & Fletcher
493	Shook & Fletcher	thermobestos	JM	thermobestos	JM	450	JM					Shook & Fletcher
495	Shook & Fletcher	thermobestos	JM	thermobestos	JM							Shook & Fletcher
496	Shook & Fletcher					450	JM					Shook & Fletcher

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HULL	SUBCONTRACTOR	PIPE	Def.	BLOCK	Def	CEMENT	Def.	CLOTH	Def.	OTHER	Def.	SOURCE
497	Shook & Fletcher											
498	Shook & Fletcher											
499	Shook & Fletcher	thermobestos	JM	thermobestos	JM							Shook & Fletcher
576	Shook & Fletcher											
577	Shook & Fletcher											
580	Shook & Fletcher											
584	Shook & Fletcher											
585	Shook & Fletcher											
586	Shook & Fletcher											
587	Shook & Fletcher											

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HULL	SUBCONTRACTOR	PIPE	Def.	BLOCK	Def.	CEMENT	Def.	CLOTH	Def.	OTHER	Def.	SOURCE
591												
593												
594												
597												
598												
1019	Shook & Fletcher	superex	JM	thermobestos	JM	352	JM					Shook & Fletcher
		thermobestos	JM	kaylo	OI	450	JM					Shook & Fletcher
1020												
1061												
1064	Shook & Fletcher	kaylo	OI	kaylo	OI							Shook & Fletcher
		thermobestos	JM	thermobestos	JM							Shook & Fletcher

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IULL	SUBCONTRACTOR	PIPE	Def.	BLOCK	Def.	CEMENT	Def.	CLOTH	Def.	OTHER	Def.	SOURCE
1082	Shook & Fletcher	thermobestos	JM			superex 1900	JM					Shook & Fletcher
						450	JM					Shook & Fletcher
1095	Shook & Fletcher	thermobestos	JM	thermobestos	JM	301	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
1107	Badham	thermobestos	JM			450	JM	generic	RM			Badham
1110	Shook & Fletcher	thermobestos	JM	thermobestos	JM	301	JM			marinite	JM	Hopeman Bros. Shook & Fletcher
						352	JM					Shook & Fletcher
1129	Shook & Fletcher									marinite	JM	Hopeman Bros.
1130	Shook & Fletcher									marinite	JM	Hopeman Bros.
1131	Shook & Fletcher									marinite	JM	Hopeman Bros.
1132	Shook & Fletcher									marinite	JM	Hopeman Bros.
1151	Badham					352	JM	generic	RM			Badham

CRMC-Motley1000-Subj-005042

IULL	SURCONTRACTOR	PIPE	Def.	BLOCK	Def.	CEMENT	Def.	CLOTH	Def.	OTHER	Def.	SOURCE
1156	Shook & Fletcher					450	JM					Shook & Fletcher
						302	JM					Shook & Fletcher
1157	Shook & Fletcher			thermobestos	JM					marinite	JM	Ingalls Shook & Fletcher
1158	Shook & Fletcher			thermobestos	JM					marinite	JM	Ingalls Shook & Fletcher
1159				thermobestos	JM					marinite	JM	Ingalls Hopeman Bros.
1160				thermobestos	JM					marinite	JM	Ingalls Hopeman Bros.
1162	Badham			thermobestos	JM	352	JM	generic	RM			Badham
1163	Badham	thermobestos	JM	thermobestos	JM	352	JM	generic	RM			Badham
1168	Shook & Fletcher					352	JM					Shook & Fletcher
1169	Shook & Fletcher							porterlag	HKP			Shook & Fletcher

CRMC-Motley1000-Subj-005043

HULL	SUBCONTRACTOR	PIPE	Def.	BLOCK	Def.	CEMENT	Def.	CLOTH	Def.	OTHER	Def.	SOURCE
1170	Shook & Fletcher					450	JM	porterlag	HKP			Shook & Fletcher
1171	Shook & Fletcher					352	JM					Shook & Fletcher
1177	Badham							generic	RM	marinite	JM	Hopeman Bros. Badham

CRMC-Motley1000-Subj-005044