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 Gener
certify on his behalf, under the seal of the National Archives of the Unite
the attached reproduction(s) is a true and correct copy of documents in his

(seal)

SIGNATURE
Anthony Lentini
NAME
Anthony Lentini
DATE
11
TITLE
Archivist, Archives Branch
NAME AND ADDRESS OF DEPOSITORY
Federal Archives and Records C
Building 22 - MOT - Bayonn
Bayonne, N.J. 07002
2NCN

M-252

CRMC-Motley1000-Subj-003923

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY.

JULIA LACHO, as General Administratrix of the Estate of John Lacho, and as Administratrix ad Prosequendum of the Estate of John Lacho, deceased,

Plaintiff,

v.

JOHNS-MANVILLE CORPORATION,

Defendant.

ACTION AT LAW.

DISCONTINUANCE.

The above entitled matter having been settled by and between the parties hereto, it is hereby discontinued without costs to either party as against the other.

ATTORNEYS FOR PLAINTIFF.

ATTORNEYS FOR DEFENDANT.

Docket entry 457

CRMC-Motley1000-Subj-003924

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY.

JULIA LACHO, as General Administratrix of the Estate of John Lacho, and as Administratrix ad Prosequendum of the Estate of John Lacho, deceased,

Plaintiff, : ACTION AT LAW.

v. : DISCONTINUANCE.

JOHNS-MANVILLE CORPORATION,

Defendant. :

The above entitled matter having been settled by and between the parties hereto, it is hereby discontinued without costs to either party as against the other.

ATTORNEYS FOR PLAINTIFF.

ATTORNEYS FOR DEFENDANT.

Court Ainq 457

[redacted]

AI CIVIL - 457

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY.

JULIA LACHO, as General Administratrix of the Estate of John Lacho, and as Administratrix ad Prosequendum of the Estate of John Lacho, deceased,

Plaintiff,

v.

JOHNS-MANVILLE CORPORATION,

Defendant.

ACTION AT LAW.

DISCONTINUANCE.

COX & WALBURG, ESQS.,
Attorneys for Plaintiff,
60 Park Place,
Newark, N.J.

FILED
JAN 31 1939
9 O'CLOCK A. M.
SEWARD F. HAVENS, CLERK

CRMC-Motley1000-Subj-003926

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 D'Santozzi

NAME
Anthony J. Santozzi

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
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NOTICE OF TRIAL.—ALL LAW COURTS.—S.

A17004 Shurtz Law Blank, Inc., Law Blank Publishers, 85-87 Academy Street, Newark, N. J.

UNITED STATES DISTRICT Court.
FOR THE DISTRICT OF NEW JERSEY.

JULIA LACHO, as General Administratrix Etc.
Plaintiff,
vs.
JOHNS-MANVILLE CORPORATION,

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 third *Tuesday of* October, *A. D. 19* 39, *at the* ~~COURTHOUSE~~ Federal Bldg., Newark, *in and for the County of* *at ten o'clock in the forenoon, or as soon thereafter as the said Court can attend to the same.*

Dated September 28th, *A. D. 1939*

Your obedient servant,

Leo Challenger

Attorney S *of Plaintiff*

To HOBART, MINARD & COOPER, *Esqs.*
Attorney of Defendant
1180 Raymond Blvd.,
Newark, N.J.

CRMC-Motley1000-Subj-003928

UNITED STATES DIST. Court
FOR THE DISTRICT OF NEW JERSEY.

JULIA LACHO, as Genl. Administratrix Etc.,
Plaintiffs,
v.
JOHNS-MANVILLE CORPORATION,
Defendant.

Action at law

Notice of Trial.

COX & WALBURG,
Attorney of Plaintiff
60 Park Place,
Newark, N.J.

Service of the within Notice of Trial is hereby acknowledged this 29 *day of* Sept *A. D. 1939*

Attorney of Defendant

Summons issued Aug. 1, 1939.

FILED
SEP 30 1939
AT 9.05 O'CLOCK A. M.
BENJAMIN F. HAVENS, CLERK

CRMC-Motley1000-Subj-003929

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. Lantoz

NAME: Anthony J. Lantozzi | 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-003930

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UNITED STATES DISTRICT COURT.
FOR THE DISTRICT OF NEW JERSEY.

JULIA LACHO, as General Administratrix of the Estate of John Lacho, and as Administratrix ad Prosequendum of the Estate of John Lacho, Deceased,

Plaintiff,

v.

JOHNS-MANVILLE CORPORATION,

Defendant.

ACTION AT LAW.

DEMAND FOR JURY.

TO: HOBART, MINARD & COOPER, ESQS.,
Attorneys for Deft.,
1180 Raymond Blvd.,
Newark, New Jersey.

SIRS:

TAKE NOTICE that the plaintiff herein demands a trial by jury of all issues in the within cause of action.

Respectfully,

Cox & Walburg

(Cox & Walburg)
Attorneys for Plaintiff.

CRMC-Motley1000-Subj-003931

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UNITED STATES DISTRICT COURT.
FOR THE DISTRICT OF NEW JERSEY

JULIA LACHO, as General Administratrix etc.,

Plaintiff,

v.

JOHNS-MANVILLE CORPORATION,

Defendant.

ACTION AT LAW.

DEMAND FOR JURY.

COX & WALBURG (ESQS.)
Attorneys for Plaintiff,
60 Park Place,
Newark, N.J.

SEP 30 1939

AT O'CLOCK A. M.
BENJAMIN F. HAVENS, CLERK

CRMC-Motley1000-Subj-003932

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 Fiorentini

DATE 11/3/80

TITLE Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY
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Bayonne, N.J. 07002
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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY.

Julia Lacho, Gen.Admx.	:	
vs.	:	XXX CIVIL 457
Johns-Manville Corporation	:	
	:	

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.

Benjamin F. Havens,
Clerk

by
Charles S. Chevrier,
Chief Deputy.

CRMC-Motley1000-Subj-003934

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GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

To all to whom these presents shall come, Greeting:

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(seal)

SIGNATURE

NAME: Anthony J Fondello | 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
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CRMC-Motley1000-Subj-003936

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JULIA LACHO, as General Administratrix of the Estate of John Lacho, and as Administratrix ad Prosequendum of the Estate of John Lacho, Deceased,

Plaintiff,

-vs-

JOHNS-MANVILLE CORPORATION,

Defendant.

Action at Law

ANSWER

Defendant, JOHNS-MANVILLE CORPORATION, a corporation of the State of New York, having its principal office in New Jersey at Manville, Somerset County, says that:

FIRST DEFENSE TO FIRST COUNT

1. It admits Paragraph 1.

2. It admits Paragraph 2.

3. It admits that the matters in issue in the within case are between citizens of different states of the United States and are alleged to involve, exclusive of costs and interest, a sum in excess of $3,000.00.

4. It has no knowledge or information sufficient to form a belief as to the allegations of Paragraph 4.

5. It admits Paragraph 5.

6. It denies the allegations of Paragraph 6 but states that John Lacho was employed by the defendant corporation from July 1, 1914 to May 15, 1922; was re-employed from August 1, 1925 to September 20, 1925; and was again re-employed from January 5, 1926 to September 20, 1937.

CRMC-Motley1000-Subj-003937

7. It denies the allegations of Paragraph 7 but states that John Lacho was employed as a warper from July 1, 1914 to August 27, 1925, except for the periods mentioned in Paragraph 6 of this answer within which he was not employed by the defendant; and as a weaver from August 27, 1925 to October 21, 1937, except for said periods in which he was not employed by this defendant; in which weaving department the defendant, through the plaintiff's decedent and other employees, wove various articles composed in part of asbestos.

8. It denies Paragraph 8.

9. It denies Paragraph 9.

10. It denies Paragraph 10.

11. It denies Paragraph 11.

12. It denies Paragraph 12.

13. It denies Paragraph 13.

14. It denies Paragraph 14.

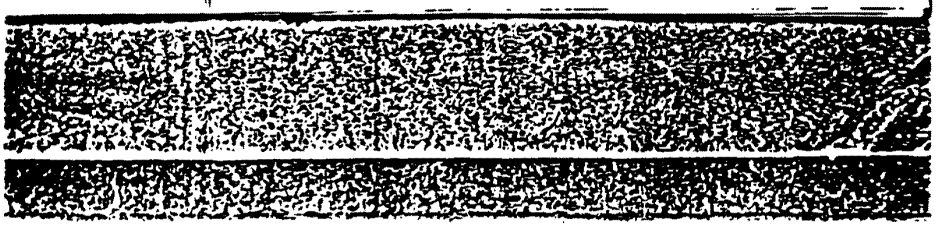
15. It denies Paragraph 15.

SECOND DEFENSE TO FIRST COUNT

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

THIRD DEFENSE TO FIRST COUNT

The injury and the disease alleged in the complaint were due to one of the risks of his employment assumed by the plaintiff's intestate as part of the terms of his contract of employment in that the plaintiff's intestate knew, or by the exercise of reasonable care on



CRMC-Motley1000-Subj-003938

his employment.

FOURTH DEFENSE TO FIRST COUNT

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

FIFTH DEFENSE TO FIRST COUNT

The injury and the disease alleged in the complaint were caused by contributory negligence on the part of the plaintiff's intestate in that the plaintiff's intestate filed to exercise reasonable care to protect himself against the alleged dangers of his employment by using the mask and other appliances provided by the defendant for that purpose.

SIXTH DEFENSE TO FIRST COUNT

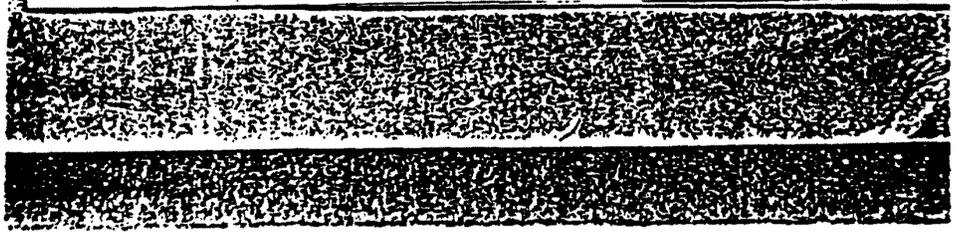
The injury and the disease alleged in the complaint were due to negligence on the part of a fellow servant of the plaintiff's intestate in failing to warn and instruct the plaintiff's intestate to use the mask and other appliances provided by the defendant for the purpose of protecting the plaintiff's intestate against the alleged dangers of his employment.

SEVENTH DEFINSE TO FIRST COUNT

The injury and disease alleged in the complaint were not due to any acts of negligence of the defendant.

EIGHTH DEFENSE TO FIRST COUNT

1. The alleged injury, if any, to the plaintiff's intestate was a trespass done to the person of said intestate.



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the alleged wrongful act, neglect or default of the defendant.

3. No action was commenced and instituted by said intestate while he was living to recover for said alleged injury within two years next after the alleged cause of action accrued to said intestate.

NINTH DEFENSE TO FIRST COUNT

1. It repeats the allegations of Paragraph 1 of the Eighth Defense to First Count.

2. It repeats the allegations of Paragraph 2 of the Eighth Defense to First Count.

3. No action was commenced and instituted by the plaintiff to recover for said alleged injury within two years next after the alleged cause of action accrued to said intestate.

FIRST DEFENSE TO SECOND COUNT

1. It repeats the answers to each of the allegations contained in the First Count as though fully set forth herein.

2. It denies Paragraph 2.

3. It has no knowledge or information sufficient to form a belief as to the allegations of Paragraph 3.

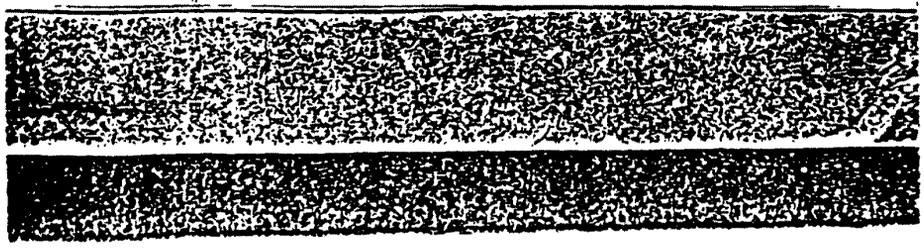
4. It denies the allegations of Paragraph 4.

SECOND DEFENSE TO SECOND COUNT

It repeats and reiterates the Second Defense to the First Count.

THIRD DEFENSE TO SECOND COUNT

It repeats and reiterates the Third Defense to the First Count.



CRMC-Motley1000-Subj-003940

FOURTH DEFENSE TO SECOND COUNT

It repeats and reiterates the Fourth Defense to the First Count.

FIFTH DEFENSE TO SECOND COUNT

It repeats and reiterates the Fifth Defense to the First Count.

SIXTH DEFENSE TO SECOND COUNT

It repeats and reiterates the Sixth Defense to the First Count.

SEVENTH DEFENSE TO SECOND COUNT

It repeats and reiterates the Seventh Defense to the First Count.

Hobart, Minard & Cooper,
By Ralph E. Cooper,
Attorneys for Defendant.

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GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

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SIGNATURE

Anthony J Lantozzi

NAME: Anthony J Lantozzi | 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
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CRMC-Motley1000-Subj-003942

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Lacho, and as Administratrix
Ad Prosequendum of the Estate
of John Lacho, Deceased,

Plaintiff,

-vs-

JOHNS-MANVILLE CORPORATION,

Defendant.

Action at Law

STIPULATION

Hobart, Minard & Cooper, Esqs.,
Attorneys for Defendant,
1180 Raymond Boulevard,
Newark, N. J.

FILED

AUG 24 1939

AT 9:05 O'CLOCK A. M.

BENJAMIN HAVENS, CLERK

CRMC-Motley1000-Subj-003943

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Civil Action No. 457

JULIA LACHO, as General Administratrix of the Estate of John Lacho, and as Administratrix ad Prosequendum of the Estate of John Lacho, Deceased,

Plaintiff,

-vs-

JOHNS-MANVILLE CORPORATION,

Defendant.

Action at Law

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by the attorneys for the respective parties hereto that the time within which the defendant shall file its answer or shall take such other steps as it may be advised is hereby extended to September 25, 1939.

Attorneys for Plaintiff

Hobart, Minard & Cooper,
By Ralph E. Cooper,
Attorneys for Defendant.

CRMC-Motley1000-Subj-003944

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GENERAL SERVICES ADMINISTRATION
National Archives and Records Service

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(seal)

SIGNATURE: Anthony Tamburro

NAME: Anthony Tamburro | DATE: 11/3/88

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-003945

District Court of the United States

FOR THE

_____ DISTRICT OF New Jersey

_____ DIVISION

CIVIL ACTION FILE NO. 457

Julia Lacho, as General Administratrix of the Estate of John Lacho and as Administratrix ad prosequendum of the Estate of John Lacho deceased
Plaintiff

v.

Johns Manville Corporation

Defendant

SUMMONS

To the above named Defendant :

You are hereby summoned and required to serve upon Cox & Walburg

plaintiff's attorney , whose address 60 Park Place, Newark, N.J.

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Benjamin F. Havens Clerk of Court.

By Kathryn M. Flynn Deputy Clerk.

Date: Aug 3, 1939. [Seal of Court]

NOTE.—This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure.

CRMC-Motley1000-Subj-003946

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Served the within Summons and Complaint on Johns Manville Corporation by delivering to and leaving with J.E.Begert, registered agent a copy thereof at Manville in the district of New Jersey, on the 4th day of August 1939, at the same time showing said person this original with the seal of the court attached and informing said person of its contents,

William P.McDermitt
United States Marshal
by Neil H Brown
deputy

No. 457

District Court of the United States

DISTRICT OF New Jersey

Julia Lacho, as General Administratrix of the Estate of John Lacho, &c.

Plaintiff

v.

Johns-Manville Corporation

SUMMONS IN CIVIL ACTION

Returnable not later than 20 days after service.

Service and return 2.00
Mileage 4.40
Amount due 6.40

U. S. Marshal.
Trenton, New Jersey.

Cox & Walburg
Attorney for Plaintiff.

RETURN ON SERVICE OF WRIT

I hereby certify and return, that on the day of 19 ,
I received the within summons

MARSHAL'S FEES

Travel ..... $.....
Service .....
.....

United States Marshal.

By .....
Deputy United States Marshal.

Subscribed and sworn to before me, a this
day of 19 .

[SEAL]

NOTE.—Affidavit required only if service is made by a person other than a United States Marshal or his deputy.

CRMC-Motley1000-Subj-003947

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. Fontoni

NAME: Anthony J Fontoni | DATE: 11/3/88

TITLE: Archivist, Archives Branch

NAME AND ADDRESS OF DEPOSITORY

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

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY.

JULIA LACHO, as General Administratrix of the Estate of John Lacho, and as Administratrix ad Prosequendum of the Estate of John Lacho, Deceased,

Plaintiff,

v.

JOHNS-MANVILLE CORPORATION,

Defendant.

ACTION AT LAW.

COMPLAINT.

The plaintiff, Julia Lacho, residing in the Town of Somerville, County of Somerset, and State of New Jersey, for her cause of action, says that:

FIRST COUNT.

1. She is and was at the time of the matters set forth in this complaint a resident of the State of New Jersey.

2. The defendant corporation is a corporation organized and existing under the Laws of the State of New York and is licensed and authorized to do business in the State of New Jersey.

3. The matters in issue in the within case are between citizens of different States of the United States and involve, exclusive of costs and interest, a sum in excess of Three Thousand Dollars ($3000.).

4. The said Julia Lacho has been appointed as Administratrix of the Estate of John Lacho, deceased, and as Administratrix ad Prosequendum of the Estate of John Lacho, deceased, by the Surrogate of the County of Somerset, State of New Jersey, the County of residence of the decedent at the

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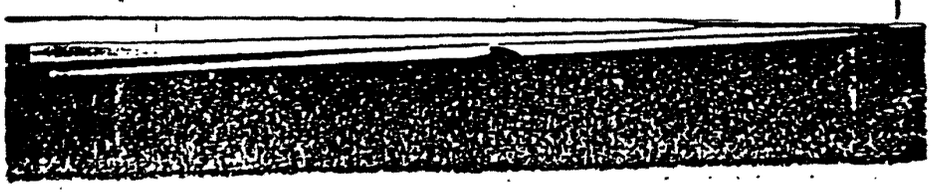
time of the matters hereinafter complained of and at the time of his death.

5. The defendant corporation is the owner and operator of a certain industrial plant in the Borough of Manville, County of Somerset, and State of New Jersey, in which plant the defendant corporation manufactures and sells various products composed of asbestos.

6. The plaintiff's decedent, John Lacho, entered the employ of the defendant corporation in the year 1915, and continued steadily in the employ of the defendant corporation from the year 1915 down to the 7th day of September, 1937, with the exception of a period of approximately two years between the years of 1922 and 1924.

7. While employed by the defendant corporation the plaintiff's decedent occupied various positions of employment, and from the year 1924, when he returned to the employ of the defendant corporation, to September 7, 1937, the plaintiff's decedent was employed by the defendant corporation in its weaving department, in which department the defendant company, through the plaintiff's decedent and other employees, wove various articles of asbestos.

8. The defendant company owed to the plaintiff's decedent the duty of exercising reasonable care to provide the plaintiff's decedent with a safe place to work and furnish to the plaintiff's decedent the various proper appliances to protect him against hazards which existed in the defendant's plant, to warn the plaintiff's decedent of the presence of the said hazards, and to instruct him in the method of using appliances furnished to him in order to secure his safety.



CRMC-Motley1000-Subj-003950

9. In the defendant's plant and in immediate proximity to the plaintiff's decedent large quantities of asbestos dust and other insidious and harmful agencies and foreign particles that were destructive to life and health in the human body were permitted by the defendant to accumulate and to remain for long periods of time in the atmosphere in the said plant, and the plaintiff's decedent, because of his employment by the defendant, was exposed to and caused to breathe large quantities of the said asbestos dust, which said dust entered and remained in his lungs, causing the lungs of the plaintiff's decedent to become affected thereby and causing the plaintiff's decedent to become ill and otherwise incapacitated so that, as a result thereof, he was forced to cease working for the defendant company on the 7th day of September, 1937.

10. The defendant corporation also omitted its duty to supply to the plaintiff's decedent the necessary or the proper instruments and devices to prevent the plaintiff's decedent from inhaling the aforementioned asbestos dust into his lungs, failed in its duty to warn the plaintiff's decedent of the presence of the dust in its plant or to instruct him in the use of any devices or instruments for his own safety.

11. The defendant company knew, or should have known, that the operation of its said plant created a hazard to the workmen employed therein through insidious and harmful agencies consisting of asbestos dust particles and other foreign particles that were destructive to life and health in the human body when they penetrated or entered the same.

12. The defendant company not only knew, but should have known, the dangerous nature of the said asbestos

CRMC-Motley1000-Subj-003951

dust particles and other foreign particles, but failed to keep the same in control, and was negligent in permitting the said asbestos dust particles and other foreign particles to escape and come in close proximity to the plaintiff's decedent and thereby exposed the plaintiff's decedent to the said asbestos dust particles and other foreign particles to the extent that his bronchial tubes, lungs, internal organs and body became infected with the same.

13. The plaintiff's decedent had no knowledge or warning from the defendant company or otherwise that he was exposed to the said asbestos dust particles and other foreign particles that he was forced to inhale by reason of the defendant's negligence.

14. The defendant company's negligence complained of is as follows:

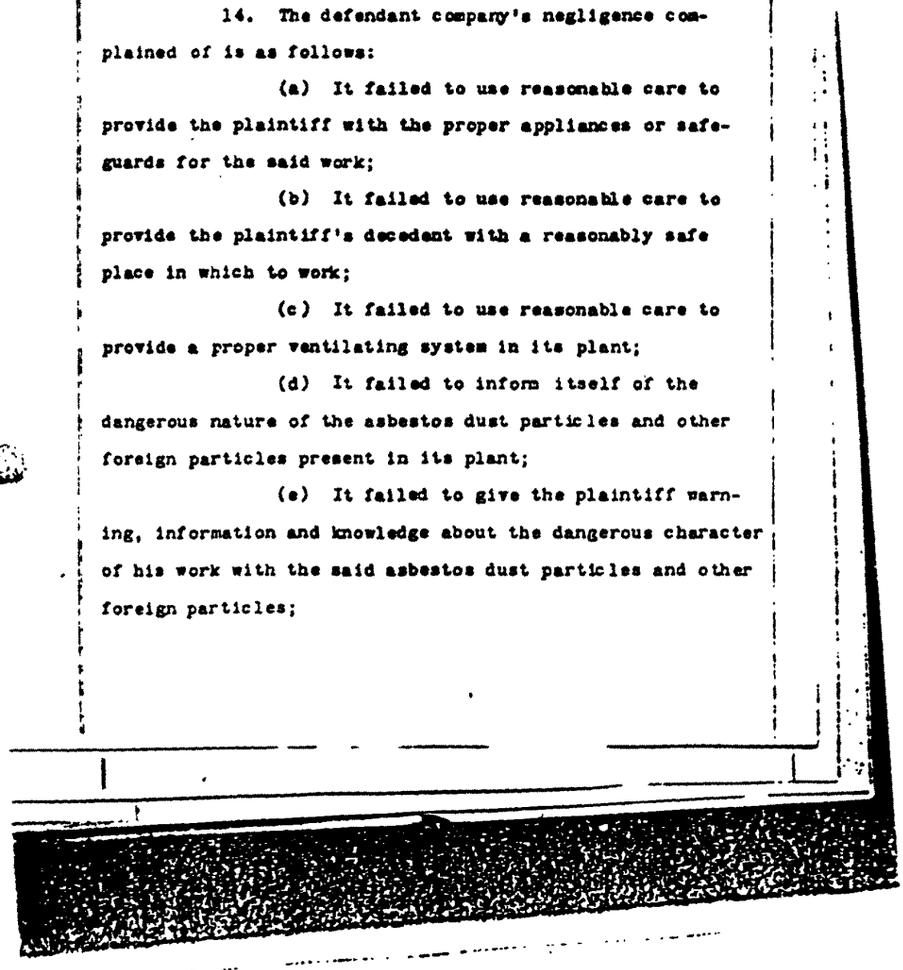
(a) It failed to use reasonable care to provide the plaintiff with the proper appliances or safeguards for the said work;

(b) It failed to use reasonable care to provide the plaintiff's decedent with a reasonably safe place in which to work;

(c) It failed to use reasonable care to provide a proper ventilating system in its plant;

(d) It failed to inform itself of the dangerous nature of the asbestos dust particles and other foreign particles present in its plant;

(e) It failed to give the plaintiff warning, information and knowledge about the dangerous character of his work with the said asbestos dust particles and other foreign particles;



CRMC-Motley1000-Subj-003952

(f) It created excessive asbestos dust particles and other foreign particles and failed to use proper and legal means to control and eliminate the same;

(g) It was negligent in its operation of such dust collecting and dust eliminating machines as it did install;

(h) It violated Section 20 of the Labor Laws of the State of New Jersey, as amended by P. L. 1912, Chapter 5, in that it failed to provide and maintain proper and sufficient means of ventilation in its said plant and failed, so far as practicable, to ventilate its said plant in such manner as to render the dust and other impurities of the plant harmless.

15. As a result of the negligence of the defendant as above set forth, the said asbestos dust particles and other foreign particles were introduced into the plaintiff's decedent's system and body at the place aforesaid so that the plaintiff's decedent was caused to suffer severe and permanent pulmonary conditions which were caused and/or aggravated, accellerated and exacerbated through his inhalation of the said asbestos dust and other dust particles, and by reason of the foregoing the power of resistance to disease of the plaintiff's decedent was impaired, the span and duration of his life shortened, his heart and other internal organs and general physical condition suffered as a result thereof, causing the plaintiff's decedent to suffer great pain and mental anguish, shortness of breath, and loss of weight, and causing the plaintiff's decedent to incur the expenditure of large sums of money for his medical attention and treatment, and preventing him from working from

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the date of September 7, 1937, down to the date of his death October 21, 1938, as a result of which he lost large sums of money which he otherwise would have earned.

WHEREFORE the plaintiff, Julia Lacho, as Administratrix of the Estate of John Lacho, deceased, demands the sum of FIFTY THOUSAND DOLLARS ($50,000.) of the defendant.

SECOND COUNT.

The plaintiff, Julia Lacho, as Administratrix ad Prosequendum of the Estate of John Lacho, deceased, says that:

1. She repeats each of the allegations contained in the First Count.

2. As a result of the negligence of the defendant as above set forth and the illness and disease contracted by the plaintiff's decedent. and/or aggravated, accellerated and exacerbated as a result thereof, the plaintiff's decedent died on October 21, 1938.

3. At the time of the death of the plaintiff's decedent he left him surviving the following: Julia Lacho, his wife, Elizabeth Lacho, daughter, and John Lacho, Jr., his son, all of whom have suffered a pecuniary loss by reason of the wrongful death of the plaintiff's decedent, John Lacho.

4. This action is brought within twenty-four calendar months of the time of the wrongful death of the plaintiff's decedent.

WHEREFORE the plaintiff demands the sum of FIFTY THOUSAND DOLLARS ($50,000.), together with the costs of this action.

Cox & Calhoun
ATTORNEYS FOR PLAINTIFF.

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JULIA LACHO, as General Administratrix of the Estate of John Lacho, and as Administratrix ad prosequendum of the Estate of John Lacho, Deceased,

Plaintiff,

v.

JOHNS-MANVILLE CORPORATION,

Defendant.

ACTION AT LAW.

COMPLAINT.

COX & WALBURG, ESQS.,
Attorneys for Plaintiff,
60 Park Place,
Newark, N.J.

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