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

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NEW JERSEY SUPREME CO[illegible]

SOMERSET COUNTY

PAULINE LASIN, administratrix ad prosequendum of the rights, goods, chattels and credits of JOHN LASIN, deceased,

Plaintiff,

vs.

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

Defendant,

ACTION AT LAW.

C O M P L A I N T

The plaintiff, Pauline Lasin, administratrix ad prosequendum of the rights, goods, chattels and credits of John Lasin, deceased, residing at Manville, New Jersey, says that:

1. The intestate, John Lasin, was in the employ of the defendant corporation, at its plant in Manville, New Jersey, in the year 1928, and for several years prior thereto.

2. The defendant corporation, at the time herein set forth, was engaged in the manufacture of asbestos products for commercial purposes.

3. The said defendant employed the intestate at the time and place above set forth in its manufacture of said asbestos products, and the said defendant not only knew, but should have known, that the said asbestos products contained certain dangerous, insidious and harmfu agencies composed of asbestos fibers and other particles that were destructive to life and health in the human body when brought into close contact with the same.

4. The defendant not only knew, but should have known, the dangerous nature of said asbestos fibers and particles, and failed to keep the same in control, but we negligent in allowing the said dangerous fibers and part

-1-

T. J. Flynn
Assistant Secretary.

CRMC-Motley1000-Subj-003691

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cles to escape and to come into close proximity of the intestat 's person and exposed the intestate so so that he came into contact with, and inhaled, the said dangerous fibers and particles to the extent that his bronchial tubes,-lungs and body became infected with the same.

8. Intestate was not informed or warned by the defendant and had no knowledge of the nature of the said dangerous asbestos fibers and particles with which he was brought into close proximity by the defendant's negligence.

6. The negligence of the defendant complained of is a s follows:

(a) In failing to use reasonable care to provide the intestate with a reasonably safe place of work.

(b) In failing to use reasonable care to provide the intestate with proper masks or other appliances or safe guards in said work.

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

(d) In failing to use reasonable care to give proper warning, information and knowledge about the dangerous character of its work with the said asbestos fibers and particles to the intestate, at the time and place above mentioned.

7. The said asbestos fibers and particles were introduced into the intestate's body at the time and place aforesaid,so that the intestate was caused t suffer serious injuries, externally and internally, in and about his head, body and limbs, and his resistance power was lowered, and he died, as a result thereof, on February 3, 1929.

T. J. Flynn
Assistant Secretary.

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8. On the 14th day of May,1929,the plaintiff,Pauline Lasin, was duly appointed,by the Surrogate of Somerset County,administratrix ad prosequendum of John Lasin, to prosecute the action for damages,for the death of her intestate, for the benefit of the widow and next of kin of John Lasin,deceased,and now proffers Her letters of administration.

9. The said John Lasin left surviving him, his widow, Pauline Lasin,administratrix,as aforesaid, who is 37 years of age,and his children, aAnna Lasin, 11 years of age;Paul Lasin 9 years of age; alter Lasin, 7 years of age; Helen Lasin, 6 years of age;Mary Lasin, 3 years of age; and Edward Lasin, 2 years of age; all dependent upon the said intestate for support.

10. Plaintiff, as administratrix, as aforesaid,for the benefit of said next of kin, is vested by virtue of the statute, in such cases, made and provided, with a cause of action against the defendant, for negligently causing the death of her intestate, and brings this action within two years after the death of said intestate.

11. The said widow,and next of kin, suffered pecuniary losses, by reason of the death of the said John Lasin, in the sum of $40,000.00.

Plaintiff demands the sum of $40,000.00as damages from the defendant.

SAMUEL GRESTONE,

Attorney for Plaintiff.

T. J. Flynn

Assistant Secretary.

CRMC-Motley1000-Subj-003693

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Aug. 21, 1929, I served the within summons and complaint upon Johns-Manville Corporation a corporation of the State of New York, by serving Frank Ryan its Assistant Manager, personally at Manville, N. J.

Fees $3.78

Ira E. Brokow, Sheriff,
Marvin Sheets Under Sheriff.

NEW JERSEY SUPREME COURT

SOMERSET COUNTY.

Pauline Lasin, administratrix ad prosequendum of the rights, goods, chattels and credits of John Lasin, deceased,

Plaintiff

vs.

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

Defendant

ACTION AT LAW

SUMMONS AND COMPLAINT.

Samuel Greenstone
Attorney for Plaintiff
972 Broad St.
Newark, N. J.

Filed Aug. 23, 1929,
Fred L. Bloodgood, Clerk.

CRMC-Motley1000-Subj-003694

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NEW JERSEY SUPREME COURT
[illegible] COUNTY

PAULINE LASIN, Administratrix ad prosequendum of JOHN LASIN, deceased,

Plaintiff,

-vs-

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

Defendant.

Action at Law.

NOTICE OF REMOVAL

TO - SAMUEL GRUTSTONE, ESQ.,
Attorney for Plaintiff.

PLEASE TAKE NOTICE that on Tuesday, September 10th, 1929, at 10.30 o'clock in the forenoon (Daylight Saving Time), or as soon thereafter as we may be heard, at the Court House in Hackensack, N. J., we shall present to His Honor, Charles [illegible]. Parker, one of the Justices of the Supreme Court, a petition of Johns-Manville Corporation, the defendant named in the above entitled suit, for the removal of the said suit to the District Court of the United States, for the District of New Jersey, and shall also then and there present to the said Justice the bond mentioned in the said petition and shall also apply for the removal of the said cause to the District Court of the United States, for the District of New Jersey: and immediately thereafter we shall file said petition and bond; all according to the Act of Congress in such case made and provided.

Dated: August 23, 1929.

Respectfully,

[illegible]

Attorneys for Defendant, appearing specially.

T. J. Flynn
Assistant Secretary.

CRMC-Motley1000-Subj-003695

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NEW JERSEY SUPREME COURT
SOMERSET COUNTY

PAULINE LASIN, Administratrix
ad Prosequendum of JOHN LASIN,
deceased,

Plaintiff,

-vs-

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

Defendant

Action at Law.

NOTICE OF REMOVAL

Hobart & Minard
attys. for Defendant
appearing specially
24 Branford Place
Newark, N.J.

Service admitted
Aug. 1929

Attorney of Plaintiff

Filed Sept. 11, 1929,
Fred L. Hoodgood, Clerk.

STATE OF NEW JERSEY:
COUNTY OF ESSEX :

JOHN R. HOBART, being duly sworn, according to law, on his oath, deposes and says that on Friday, August 23,1929, at about 4.00 o'clock p.m., he served the within Notice of Removal on the attorney of the plaintiff, by leaving a copy thereof with the person in charge of said office, No. 972 Broad St., Newark,N.J.

John R. Hobart

Subscribed and sworn to
at Newark,N.J. this
24th day of August,1929
before me

Augustine J.Kelly
An attorney at Law of New Jersey

CRMC-Motley1000-Subj-003696

NEW JERSEY SUPREME COURT
[illegible] COUNTY

PAULINE LASIN, Administratrix ad prosequendum of JOHN LASIN, deceased,

Plaintiff,

-vs-

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

Defendant.

Action at Law.

PETITION FOR REMOVAL.

TO THE HONORABLE, SUPREME COURT OF THE STATE OF NEW JERSEY:

The petition of JOHNS-MANVILLE CORPORATION, a corporation of the State of New York, the above named defendant, appearing herein specially and for the sole purpose of presenting its petition to this Honorable Court for the removal of this suit to the District Court of the United States, for the District of New Jersey, respectfully shows that:

1. The plaintiff is the only plaintiff in the above suit and at the time of the commencement thereof was and still is a resident and citizen of the State of New Jersey.

2. Your petitioner is the defendant in said suit and was at the time of the commencement thereof and still is a corporation existing under and by virtue of the laws of the State of New York, and is a resident and citizen of said State of New York, and the controversy in said suit is wholly between citizens of different states.

3. Said suit is of a civil nature, at law, and the matter in controversy in said suit exceeds, exclusive of interest and costs, the sum or value of $3,000., to wit, the sum or value of $40,000., the amount demanded by the plaintiff in said suit as damages from your petitioner, the defendant therein.

[illegible] the City of New York, this 12th day of July A.D. 1929.

T. J. Flynn
Assistant Secretary.

CRMC-Motley1000-Subj-003697

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4. No special bail was originally or is requisite in said suit.

5. Said suit was commenced by service of summons and complaint upon your petitioner on August 21,1929, by leaving a copy thereof with petitioner at Manville, N. J.; the time within which the petitioner is required to answer said complaint has not expired but will expire on September 10,1929, unless further time to answer is allowed. The petitioner has not filed its answer to said complaint or in any way appeared in said action.

6. Your petitioner has made and files herewith a bond with good and sufficient surety for its entering in the District Court of the United States, for the District of New Jersey, within thirty days from the filing of this petition, a certified copy of the record in said suit, and for paying all costs that may be awarded by said District Court, if said District Court shall hold that said suit was wrongfully or improperly removed thereto, said bond being in the penal sum of $500., conditioned as required by the Act of Congress in such case made and provided.

Your petitioner prays this Honorable Court to proceed no further in said suit except to accept this petition and bond, make the order of removal required by law and cause the record in said suit to be removed into said District Court of the United States, for the District of New Jersey, pursuant to the Act of Congress in such case made and provided.

And your petitioner will ever pray,etc.

JOHNS-MANVILLE CORPORATION
By L. A. Huff
Vice-President

Attest:
Laura L. Boggs
Assistant Secretary

HOBART & HOBART
Attorneys of Petitioner,
appearing specially,etc.

(LS)

State of New York, City of New York, ss.:

Be it remembered that on this 12th day of July A.D. 1929, before me personally appeared T. J. Flynn, who being by me first duly sworn, deposes and says that he is Assistant Secretary of Johns-Manville Corporation, the petitioner mentioned in the foregoing petition; that he has read the said petition and knows the contents thereof; that the same is true of his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters he believes it to be true.

T. J. Flynn
Assistant Secretary.



CRMC-Motley1000-Subj-003698

STATE OF NEW YORK :
: ss.
COUNTY OF NEW YORK :

L. R. Hoff of full age,

being duly sworn, according to law, on his oath, says that he is Vice-President of Johns-Manville Corporation, a corporation of the State of New York, the defendant in within mentioned suit and the petitioner named in the foregoing petition; that he has read said petition and knows the contents thereof and that the matters stated therein are true; that the matter in controversy in said suit exceeds, exclusive of interest and costs, the sum or value of $3,000; said suit is of a civil nature, at law, and is between citizens of different states, as appears from the complaint of the plaintiff therein, and he is informed and believes that the District Court of the United States has original jurisdiction thereof; and that the controversy in said suit can be fully determined as between the plaintiff and the defendant.

L. R. Hoff.

Subscribed and sworn to at New York, N.Y. this 26th day of August, 1929, before me T. C. Rowe, Jr. duly commissioned and sworn as witness my hand and official seal.

T. C. Rowe, Jr.
Notary Public #753
(LS)

...the City of New York, this 12th day of July A.D. 1929.

T. J. Flynn
Assistant Secretary.

CRMC-Motley1000-Subj-003699

SOMERSET COUNTY

PAULINE LASIN, Administratrix ad prosequendum of JOHN LASIN, deceased,

Plaintiff,

-vs-

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

Defendant

Action at Law
PETITION FOR REMOVAL

Hobart & Minard
Attorneys for Defendant
appearing specially
24 Branford Place
Newark, N.J.

Filed Sept. 11, 1929,
Fred L. Bloodgood, Clerk.

CRMC-Motley1000-Subj-003700

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Lasin v. Johns-Manville, Court Papers (1929)
ACL Doc 23913 · Page 11 of 35

NEW JERSEY SUPREME COURT
SOMERSET COUNTY

PAULINE LASIN, Administratrix ad prosequendum of JOHN LASIN, deceased,

Plaintiff,

-vs-

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

Defendant.

Action at Law.

BOND ON REMOVAL

KNOW ALL MEN BY THESE PRESENTS: That we, JOHNS-MANVILLE CORPORATION, a corporation of the state of New York, as principal, and NEW YORK INDEMNITY COMPANY, a corporation of the state of New York, as surety, are held and firmly bound unto PAULINE LASIN, Administratrix ad prosequendum of JOHN LASIN, deceased, residing at Manville, New Jersey, in the penal sum of Five Hundred Dollars, lawful money of the United States, to be paid to the said PAULINE LASIN, Administratrix ad prosequendum of JOHN LASIN, deceased, her heirs, executors, administrators, successors and assigns, to which payment well and truly to be made, we bind ourselves, our successors and assigns, jointly and severally, firmly by these presents.

Sealed with our seals and dated the twenty-seventh day of August, 1929.

WHEREAS, the above named PAULINE LASIN, Administratrix ad prosequendum of JOHN LASIN, deceased, has heretofore brought a suit of a civil nature, at law, in the New Jersey Supreme Court, against said JOHNS-MANVILLE CORPORATION, a corporation of the State of New York; and

WHEREAS, said JOHNS-MANVILLE CORPORATION, simultaneously with the filing of this bond, intends to file its petition in said suit in said New Jersey Supreme Court, to

the City of New York, this 12th day of July A.D. 1929.

T. J. Flynn
Assistant Secretary.

CRMC-Motley1000-Subj-003701

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remove said suit into the District Court of the United States, in the District where said suit is pending, to wit, the District Court of the United States in and for the District of New Jersey, according to the provisions of the Act of Congress in such case made and provided, now, therefore,

THE CONDITION OF THIS OBLIGATION IS SUCH, that if the petitioner, JOHNS-MANVILLE CORPORATION, shall enter in the District Court of the United States, for the District of New Jersey, within thirty days fromthe date of filing said petition in said New Jersey Supreme Court, a certified copy of the record in said suit, and shall well and truly pay all costs that may be awarded by the said District Court, if said District Court shall hold that said suit was wrongfully or improperly removed thereto, and shall also appear and enter special bail in said suit, if special bail was originally requisite therein, then this obligation shall be void; otherwise to remain in full force and effect.

JOHNS-MANVILLE CORPORATION

By C.R. Hoff
Vice President (LS)

Attest:
Clarence L. Rogers
Assistant Secretary

NEW YORK INDEMNITY COMPANY

By John C. Gallagher
Attorney-in-fact (LS)

Witness
Mildred A. Rhodes

Notary Public

at the City of New York, this 12th day of July A.D. 1929.

T. J. Flynn
Assistant Secretary.

CRMC-Motley1000-Subj-003702

STATE OF NEW YORK }
COUNTY OF NEW YORK } ss.

BE IT REMEMBERED, That on this 26th day of August, in the year of our Lord, One thousand nine hundred and twenty-nine, before me, the subscriber, T. C. Rowe, Jr. personally appeared Clarence L. Hoyer who being by me duly sworn, doth depose and make proof to my satisfaction that he is Assistant Secretary and that he well knows the common seal of JOHNS-MANVILLE CORPORATION, the obligor named in the foregoing bond, that the seal thereto affixed is the proper common seal of the said corporation, and that the same was so affixed thereto, and the said bond signed and delivered by C. R. Huff who was at the date and execution thereof Vice President of said Corporation, as the voluntary act and deed of the said Corporation, in the presence of said deponent, and that the said deponent subscribed the same as witness to the execution thereof.

Subscribed and sworn to at New York, N.Y. this 26th day of August, 1929, before me T. C. Rowe, Jr. duly commissioned and sworn as witness my hand and official seal.

Clarence L. Hoyer

T. C. Rowe Jr.

Notary Public #75 J. [illegible] that he resides in the [illegible] of New York, [illegible] of the [illegible] as [illegible] Notary.

(LS)

[illegible] at the City of New York, this 12th day of July A.D. 1929.

T. J. Flynn
Assistant Secretary.



CRMC-Motley1000-Subj-003703

NEW YORK INDEMNITY COMPANY

KNOW ALL MEN BY THESE PRESENTS, that the NEW YORK INDEMNITY COMPANY, a corporation duly organized and existing under the laws of the State of New York, and having its principal offices in the City of New York, hath made, constituted and appointed, and does by these presents make, constitute and appoint John C. Gallagher, individually, of Newark and State of New Jersey its true and lawful Attorney, with full power and authority hereby conferred in its name, place and stead, to sign, execute and acknowledge with the exception of Bail Bonds, any and all bonds and/or undertakings in any amount not exceeding One Hundred Thousand Dollars ($100,000), and to bind the NEW YORK INDEMNITY COMPANY thereby as fully and to the same extent as if such bonds were signed by the President, sealed with the common seal of the Company, and duly attested by its Secretary, hereby ratifying and confirming all the acts of said Attorney pursuant to the power herein given. This Power of Attorney is made and executed pursuant to and by authority of the following By-Law adopted by the Board of Directors of the New York Indemnity Company at a meeting duly called and held on the twenty-fifth day of July, 1923:

"ARTICLEXII. Resident Officers and Attorneys-in-Fact.

"Section 1. The Chairman, Vice-Chairman, President, First Vice-President, or any other Vice-President may from time to time appoint Resident Vice-Presidents, Resident Assistant Secretaries and Attorneys-in-Fact to represent and act for, and on behalf of the Company, and either the Chairman, Vice-Chairman, President, First Vice-President, or any other Vice-President, the Board of Directors, or the Executive Committee, may at any time remove any such Resident Vice-President, Resident Assistant Secretary or Attorney-in-Fact, and revoke the power and authority given him.

"Section 4. Attorneys-in-Fact.-Attorneys-in-Fact may be given full power and authority to execute for and in the name of and on behalf of, the Company, and any and all bonds, recognizances, contracts of indemnity and other writings obligatory in the nature of a bond, recognizance, or conditional undertaking, and any such instrument executed by any such Attorney-in-Fact shall be as binding upon the Company as if signed by the President and sealed and attested by the Secretary.

"Section 6. Attorneys-in-Fact.-Attorneys-in-Fact are hereby authorized to verify any affidavit required to be attached to bonds, recognizances, or contracts of indemnity, policies of insurance, and all other writings obligatory in the nature thereof, and also authorized and empowered to certify to a copy of any By-Laws contained in Articles VI, XII, and XIII of the By-Laws of the Company."

IN WITNESS WHEREOF, the NEW YORK INDEMNITY COMPANY has caused these presents to be signed by its Vice-President and its corporate seal to be hereto affixed, duly attested by its Assistant Secretary, this 12th day of July, A.D. 1929.

(Seal)

NEW YORK INDEMNITY COMPANY

BY W. C. Billings
Vice-President.

Attest: T. J. Flynn
Assistant Secretary.

STATE OF NEW YORK,)
COUNTY OF NEW YORK,) ss.:

On this 12th day of July A.D. 1929, before me personally came W. C. Billings to me known, who, being by me duly sworn, did depose and say, that he resides in the City of New York; that he is the Vice-President of the NEW YORK INDEMNITY COMPANY, the corporation described in and which executed the above instrument; that he knows the seal of said corporation; that the seal affixed to the said instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that he signed his name thereto by like order.

(Seal)

William Dunn
Notary Public

STATE OF NEW YORK,)
COUNTY OF NEW YORK,) ss.:

I, T. J. Flynn Assistant Secretary of the NEW YORK INDEMNITY COMPANY, do hereby certify that the above and foregoing is a true and correct copy of a power of attorney, executed by said NEW YORK INDEMNITY COMPANY, which is still in full force and effect.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of said Company, at the City of New York, this 12th day of July A.D. 1929.

T. J. Flynn
Assistant Secretary.

CRMC-Motley1000-Subj-003704

State of New Jersey,
County of ESSEX ... } ss.:
City of NEWARK ...

On this Twenty-seventh day of August, 192 9, before me, the subscriber, a NOTARY PUBLIC duly commissioned and sworn, personally came JOHN C. GALLAGHER who, being by me duly sworn, on his oath, saith: That he is the ATTORNEY-IN-FACT of the NEW YORK INDEMNITY COMPANY of the State of New York, and that he resides in the City of NEWARK; that he knows the corporate seal of the said Company; that the seal affixed to the foregoing instrument is such corporate seal; and it was affixed by the said JOHN C. GALLAGHER and the said Instrument signed by the said JOHN C. GALLAGHER as ATTORNEY-IN-FACT of said Company, by order of the Board of Directors of said Company in deponent's presence as the voluntary act and deed of said Company; that said Company has duly complied with all the requirements of Chapter 134 of the Laws of the State of New Jersey of the year 1902; that the good available assets of the Company exceed its liabilities, as such liabilities are ascertained in the manner provided in said Chapter; that the NEW YORK INDEMNITY COMPANY is duly incorporated under the laws of the State of New York, and is authorized by the laws of that State and under its charter to become surety on bonds and obligations such as are mentioned in said Chapter; and has on deposit with the Superintendent of Insurance of the State of New York, good securities worth at par and at market value at least Two Hundred Thousand Dollars ($200,000) held for the security of its obligations and has a fully paid up, safely invested, and unimpaired capital of One Million Dollars, and said Company has appointed the Commissioner of Banking and Insurance of New Jersey and his successor in office as its true and lawful Attorney in the State of New Jersey, upon whom process of law can be served, and has filed in the office of the Commissioner of Banking and Insurance, a written instrument duly signed and sealed, certifying such appointment, together with the residence and office of such Attorney, within the State of New Jersey; and that the following is a true copy of a By-Law duly adopted by the Board of Directors of the said NEW YORK INDEMNITY COMPANY on the 25th day of July, 1923, at a regular meeting, to wit:

ARTICLE XIII.

SECTION 1. *Signatures required.*—All bonds, recognizances, or contracts of indemnity, policies of insurance, and all other writings obligatory in the nature thereof, shall be signed by the President, a Vice-President, a Resident Vice-President, or Attorney-in-Fact, and shall have the seal of the Company affixed thereto, duly attested by the Secretary, an Assistant Secretary, or Resident Assistant Secretary. All Vice-Presidents and Resident Vice-Presidents shall each have authority to sign such instruments, whether the President be absent or incapacitated, or not, and the Assistant Secretaries and Resident Assistant Secretaries shall each have authority to seal and attest such instruments, whether the Secretary be absent or incapacitated, or not; and the Attorneys-in-Fact shall each have authority, in the discretion of such Attorneys-in-Fact, to affix to such instruments an impression of the Company's seal, whether the Secretary be absent or incapacitated, or not, or to attach the individual seal of the Attorneys-in-Fact thereto, or to use the scroll of the Attorneys-in-Fact, or a wafer, wax, or other similar adhesive substance affixed thereto, or a seal of paper or other similar substance affixed thereto by mucilage, or other adhesive substance, or use the word "SEAL" or the letters "L. S." opposite the signature of such Attorneys-in-Fact, as the case may be.

Sworn and subscribed in the City of Newark *in the County of* Essex *and State of* New Jersey *this* 27th *day of* August *A. D.* 192 9 *before me, a* NOTARY PUBLIC *duly commissioned and sworn.*

John C. Gallagher

James E. Nowack,

CRMC-Motley1000-Subj-003705

New York Indemnity Company

New York

FINANCIAL STATEMENT, DECEMBER 31st, 1928

SPENCER, WELTON, President. HUBERT J. HEWITT, Secretary

ASSETS

Stocks and Bonds at Market	$5,562,900.00
Collateral Loans	700,000.00
Cash	359,243.55
Unpaid Premiums (Less than 90 Days old)	1,505,145.10
Accounts Receivable and Accrued Interest	440,368.91
Total	$8,567,665.65

LIABILITIES

Reserve for Unearned Premiums	$3,045,[illegible]
Reserve for Contingent Claims Less Reinsurance	2,141,888.09
Reserve for Taxes and Commissions	459,174.43
Accounts Payable	240,995.36
Reinsurance in Companies Not Entered in New York	65,732.96
Capital	1,000,000.00
Surplus	614,866.21
Total	$8,567,665.65

STATE OF NEW YORK, }
COUNTY OF NEW YORK, } ss.

I, T. J. Flynn, Assistant Secretary of the New York Indemnity Company, do hereby certify that the above is a true statement of the assets and liabilities of said Company as of December 31st, 1928, to the best of my knowledge and belief.

Thomas J. Flynn

Company's Seal

STATE OF NEW YORK, }
COUNTY OF NEW YORK } ss.

Subscribed and sworn to before me, a Notary Public of [illegible] York, in the City of New York, this 4th day of February A. D. 1929.

[illegible]

NOTARY PUBLIC
[illegible] No. 9, Register's No. 3004-A
[illegible] Filed in New York Co. No. 4[illegible]
Register's No. 6[illegible]
Commission Expires March 30, 1930

Notary's Seal

CRMC-Motley1000-Subj-003706

NEW JERSEY SUPREME COURT
SOMERSET COUNTY
- - - - - - - - - - - - - - -

PAULINE LASIN, Administratrix
ad prosequendum of JOHN
LASIN, deceased,

Plaintiff,

-vs-

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

Defendant.
- - - - - - - - - - - - - - -

Action at Law.
BOND ON REMOVAL
- - - - - - - - - - - - - - -

Hobart & Minard
Attys. for Defendant
appearing specially
24 Branford Pl.,
Newark, N.J.

Filed Sep. 11, 1929,
Fred L. Bloodgood, Clerk.

CRMC-Motley1000-Subj-003707

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NEW JERSEY SUPREME COURT
SOMERSET COUNTY

PAULINE LASIN, Administratrix ad prosequendum of JOHN LASIN, deceased,
Plaintiff,

-vs-

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

Action at Law.

ORDER FOR REMOVAL

On due notice to the attorney for plaintiff inthe above entitled cause, it is on this Tenth day of September, 1929, on motion of Hobart & Minard, attorney for the defendant therein;

O R D E R E D that the petition of said defendant for the removal of said cause to the District Court of the United States, for the District of New Jersey be, and the same hereby is accepted and that the bond presented with said petition be and it hereby is accepted and approved, and that said petition and bond be filed.

Let the foregoing order be entered.

Entered Sept 11th 1929
On motion of
HOBART & MINARD
Attorneys of Defendant, appearing specially.

C. W. Parker
J.S.C.

CRMC-Motley1000-Subj-003708

PAULINE LASIN, Administratrix
ad prosequendum of JOHN LASIN,
deceased,

Plaintiff,

vs.

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

Defendant

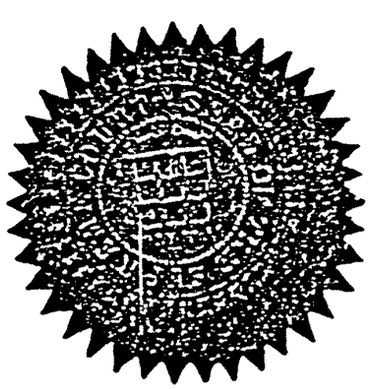
Action at Law
ORDER FOR REMOVAL

Hobart & Minard
Attorneys for Defendant
appearing specially
24 Branford Place
Newark, N.J.

CRMC-Motley1000-Subj-003709

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I, Fred L. Bloodgood, ~~Edward J. Kelleher~~, Clerk of the Supreme Court of the State of New Jersey, do certify that the foregoing is a true copy of the entire proceedings in the above stated cause as the same remain on file and of record in my office.



In testimony whereof I have set my hand and the seal of said Court at Trenton, this Eighteenth, day of September, A. D. nineteen hundred and Twenty-nine.

Fred L. Bloodgood
Clerk.

CRMC-Motley1000-Subj-003710

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

PAULINE LASIN, administratrix ad prosequendum of JOHN LASIN, deceased,
Plaintiff,

-vs-

JOHNS-MANVILLE CORPORATION, a Corporation of the State of New York,
Defendant.

Action at Law

ANSWER

The 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

1. It denies paragraph 1, except that it says that the plaintiff's intestate was in its employ at its plant in Manville, N. J., from December 28, 1926, to the year 1928.

2. It denies paragraph 2, except that it says that it was and has been engaged in the manufacture of asbestos products for commercial purposes from December 28, 1926, to the present time.

3. It denies paragraph 3, except that it says that it employed the plaintiff's intestate from December 28, 1926, to the year 1928.

4. It denies paragraphs 4, 5, 6, and 7.

SECOND DEFENSE

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

The injury and the disease alleged in the complaint were due to one of the risks of his employment assumed by

CRMC-Motley1000-Subj-003711

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 his part should have known, the alleged dangers of his employment.

FOURTH DEFENSE

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

FIFTH DEFENSE

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 failed 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

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.

Hobart & Kinnaird
Attorneys for Defendant.

CRMC-Motley1000-Subj-003712

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY.

PAULINE LASIN, administratrix ad prosequendum of John Lasin, Deceased,	:	
Plaintiff,	:	
-vs-	:	ACTION AT LAW
JOHNS-MANVILLE CORPORATION, a Corporation of the State of New ~~Jersey~~ York.	:	R E P L Y.
Defendant.	:	

Plaintiff, Pauline Lasin, administratrix ad prosequendum of John Lasin, for reply to the answer of the defendant, Johns-Manville Corporation, says that:-

1. She denies all the affirmative defenses as set forth in the answer of the defendant, Johns-Manville Corporation.

Samuel Leibowitz
ATTORNEY FOR PLAINTIFF.

CRMC-Motley1000-Subj-003713

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAULINE LASIN, administratrix ad prosequendum of JOHN LASIN, deceased,

Plaintiff,

-vs-

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

Defendant.

AFFIDAVIT OF ARCHIBALD HUGHES

STATE OF NEW JERSEY :
: ss.
COUNTY OF ESSEX :

ARCHIBALD HUGHES, being duly sworn, according to law, on his oath, deposes and says:

I reside at 143 Eastern Avenue, Somerville, N.J. and I am employed by the Johns-Manville Corporation as General Manager of the Manville plant of that company, located at Manville, N. J.

I was present at an interview between Mr. Emil Ramer and Mrs. Pauline Lasin, which was conducted on November 5, 1929 at the home of Mrs. Lasin in the Borough of Manville, Somerset County, New Jersey.

There was present at the interview in addition to Mrs. Lasin, Mr. Ramer and myself, Miss Linda Meirs, the Community Nurse of Manville.

Mrs. Lasin spoke some English but the interview, in great part, was conducted in foreign language. Sufficient of the interview was had in the English language for me to know that Mr. Ramer had explained to Mrs. Lasin that he desired information from her as to the facts which led up to the institution of the suit by her as adminis-

CRMC-Motley1000-Subj-003714

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tratrix ad prosequendum of the rights, goods, chattels and credits of John Lasin, deceased, against the Johns-Manville Corporation by summons dated August 10, 1929, and that Mr. Ramer was desirous of obtaining from Mrs. Lasin a signed statement with respect thereto.

As Mr. Ramer conversed with Mrs. Lasin he wrote in ink a statement on four sheets of white paper. When the statement was concluded, Mr. Ramer then read the statement to Mrs. Lasin, translating it into her native language, which I am informed is Ukrainian and she indicated her willingness to sign it.

After some further conversation between Mr. Ramer and Mrs. Lasin in the foreign language, Mrs. Lasin signed her name at the bottom of each of the sheets of the statement and Miss Meirs signed her name on each of the sheets of the statement as a witness. Mr. Ramer then signed his name on the last sheet of the statement and filled in the date "11-5-29".

I have today examined the four sheets of white paper purporting to be the statement of Mrs. Lasin attached hereto, and I find they are in the same condition as when finally executed by Mrs. Lasin, Miss Meirs and Mr. Ramer on November 5, 1929.

Subscribed and sworn to : Archibald G. Hughes.
before me this 11th day :
of February, 1930. :
Geo. G. Hulsart
A Notary Public of N.J.

CRMC-Motley1000-Subj-003715

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAULINE LASIN, administratrix ad prosequendum of JOHN LASIN, deceased,

Plaintiff,

-vs-

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

Defendant.

AFFIDAVIT OF EMIL RAUER

STATE OF NEW JERSEY :
: ss.
COUNTY OF ESSEX :

EMIL RAUER, being duly sworn, according to law, on his oath, deposes and says:

I reside at 2305 Fourth Avenue, Astoria, L. I.

On November 5, 1929, I arranged an interview with Mrs. Pauline Lasin, which interview was conducted at her home in the Borough of Manville, Somerset County, New Jersey, in the presence of Mr. Archibald Hughes, General Manager of the Manville, New Jersey, plant of the Johns-Manville Corporation, and Miss Linda Meirs, Community Nurse of Manville.

I found that Mrs. Lasin could speak some English but not sufficiently well to carry on the entire interview and that her native tongue was Ukrainian and that she spoke Polish very fluently. The interview was conducted in most part in the Polish language.

I explained to Mrs. Lasin that I desired information with respect to the suit instituted in her name as administratrix ad prosequendum of the rights, goods chattels and credits of John Lasin, Deceased, against the Johns-Manville Corporation, by summons dated August 10, 1929, and that I intended preparing a written statement

which I would request her to sign. She signified her entire willingness to make such statement and to sign it. I then elicited information from her, translating it to the English language and recording the information in ink on four sheets of white paper. When I had concluded the interview I then read the statement to Mrs. Lasin, translating it to Polish and she stated that it was true and accurate in all respects. I then requested that she sign her name at thebottom of each of the sheets of the statement and after she had done so, I asked Miss Meirs to sign on each of the sheets as a witness. After Miss Meirs had signed her name as requested, I signed my name at the bottom of the last sheet and filled in the date "11-5-29".

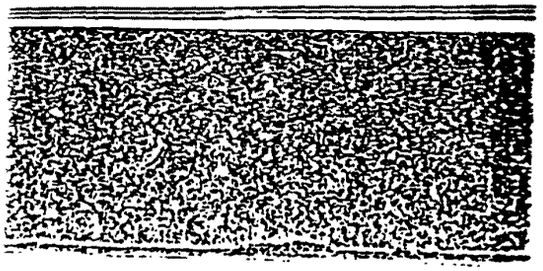
I have examined the four sheets of white paper which are in my handwriting, purporting to be the stateme of Mrs. Lasin attached hereto, and I find that they are in the same condition as when executed by Mrs. Lasin, Miss Meirs and myself on November 5, 1929.

Subscribed and sworn to : Emil Ramer.
before me this 11th day :
of February, 1930 :
Geo A Hobart
A Notary Public of N.J.

CRMC-Motley1000-Subj-003717

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ulma Lasin, but my correct
a Lahaszuk. I am Ukrainian
Poland and am a widow.
m, and we all live in Manville
me was John and he died Feb. 2
ding in John Manville for 11 years
Christmas my husband took sick
to a hospital. He came out from
e summer of 1928, and stayed home
ent back to Glen Gardner Sana
b. 1929. About April or May
e from Newark N.J. came to my
I think it was in the afternoon
ompanied at that time by
Marshall of Manville N.J.
Leansan - Polish and I spear
through English. Marshall intro
me as the brother of Mrs. Balan
then he introduced me to this
recollect the name at the presen
e spoke for the lawyer to me
id that he is suing John
death of his children, and H
the death of my husband
talked to talk to me in
understood. He told me his
sion
name



CRMC-Motley1000-Subj-003718

The lawyer to Sommerville. I signed some papers in Court, and I was asked whether my husband is dead, and the ages of children. I signed my names and I did not receive any paper. I did not tell him to fight the John Manville, I did not tell him that is the lawyer of Mrs Saran to sue the John Manville. I signed a paper, because ~~when~~ I was told by the lawyer if I sign a paper I will get money. Before me went to Court the lawyer told me, that he would pay for a grocery if I would buy one, I refused a grocery, then he said I will pay you $15.00 a week, he said you get it every week from me $15.00. This was done in presence of Mrs Saran. About 2 or 3 days after I was in Sommerville my daughter went to the Post Office and brought home a letter from the lawyer which I am holding now. The letter was addressed to me. When I opened it I found two cheques one for me $15.00 one to James Saran for $25.00. The envelope was addressed to me, the letter was written in English and my daughter said it was addressed to Mrs James Saran. I was afraid I come

Rafi Lasin

Sinclairville Nov. 5, 1929

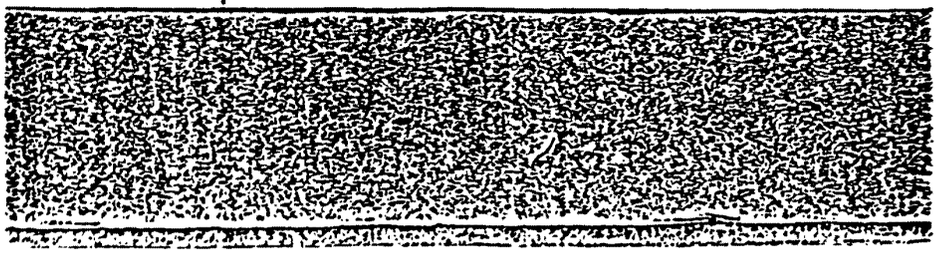
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trouble, so I did not cash my check. About a week or 2 (two) after receiving check for $15.00 Miss Saran brought me cash money, and said, here Miss Lasin is $15.00 cash money from the lawyer. I refused to take it. I got scared that I signed away my house so I went to this lawyer in Newark with Jasinski a friend of mine. Jasinski is American born. Jasinski demanded to see the papers which I signed and the lawyer said that I have signed a case against the Company, and I would get money from the State and from the Company. The lawyer asked me what I did with the checks, and I told him, that I lost them. I do not want to fight this John Manville Co, I never intended to sue this Company and I am willing to sign at any time papers discontinuing an action against Johns Manville, because I did not tell the lawyer to sue this Company. This statement was read to me in Polish and the same is true and correct. I made this statement on my free will, and was not promised any money for this statement. Polish Lasin.

witness Linda Meiss. Nov. 5, 1929

/ E. Ramus 11/5/29.



UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAULINE LASIN, administratrix ad prosequendum of the rights, goods, chattels and credits of JOHN LASIN, deceased,

Plaintiff,

vs.

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

Defendant.

On motion to Quash Summons and Dismiss Complaint.

RULE TO SHOW CAUSE

1985

On reading and filing the affidavits presented in behalf of the defendant,

O R D E R E D that the plaintiff and the plaintiff's attorney show cause before this Court on the thirty first day of ~~February~~ March, 1930, at 10.30 o'clock A.M., at the court room in the Chamber of Commerce Building, 24 Branford Place, Newark, New Jersey, why the summons herein should not be quashed and the complaint dismissed on the ground that the summons was issued and the complaint filed without the authority of the plaintiff.

FURTHER ORDERED that a copy of this rule and of said affidavits (certified as true copies by the attorneys of the defendant) be served within four days from the date hereof, upon the plaintiff either personally or by leaving same at plaintiff's residence and upon the attorney of the plaintiff either personally or by leaving same at his office in the City of Newark.

FURTHER ORDERED that on the return day of this rule the parties have leave to take testimony in open court in support thereof and in opposition thereto.

DATED: ~~February~~ March 7th 1930.

Rule entered this 11th day of ~~February~~ March, 1930, on motion of HOBART & MINARD, Attorneys of Defendant.

Guy L. Fake
U.S.D.J.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAULINE LASIN, administratrix ad prosequendum of the rights, goods, chattels and credits of JOHN LASIN, deceased,

Plaintiff,

vs.

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

Defendant.

On motion to quash summons and to dismiss complaint

AFFIDAVIT OF SERVICE

STATE OF NEW JERSEY :
: ss
COUNTY OF ESSEX :

JOHN MURRAY, being duly sworn, according to law on his oath, says:

I am employed as a clerk in the office of Hobart & Minard, attorneys of defendant. On Tuesday, March 11, 1930, at 2.30 p. m., I served upon Samuel Greenstone, attorney of record of the plaintiff, a copy of the rule to show cause herein, dated March 7, 1930, duly certified as a true copy by Hobart & Minard, attorneys of defendant, and on the same day I served upon said Samuel Greenstone a copy of the affidavits filed herein by the defendant, duly certified as true copies by Hobart & Minard, attorneys of defendant.

Said service was made by leaving said copies of said rule to show cause and said affidavits at the office of said Samuel Greenstone No. 972 Broad St., in the city of Newark, N. J., with the person in charge of said office at said time.

Subscribed and sworn to at Newark, N.J. this 12th day of March, 1930, before me.

G. A. Hobart
A Notary Public of N.J.

John Murray

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAULINE LASIN, administratrix ad prosequendum of the rights, goods, chattels and credits of JOHN LASIN, deceased,

Plaintiff,

-vs-

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

Defendant.

On motion to quash summons and dismiss complaint

AFFIDAVIT OF SERVICE

STATE OF NEW JERSEY :
:ss.
COUNTY OF SOMERSET :

ARCHIBALD HUGHES, being duly sworn, according to law, on his oath, says:

I am employed by the defendant at its factory in Manville, N. J. On Tuesday, March 11, 1930, I served upon the plaintiff a copy of the rule to show cause herein dated March 7, 1930, and copies of the affidavits filed herein by the defendant, said copies of said rule and affidavits being duly certified as true copies by Hobart & Minard, attorneys of defendant.

Said service was made by leaving said copies personally with the plaintiff at her residence in Manville, N.J.

Subscribed and sworn to at Manville, N.J. this 11th day of March, 1930, before me

Archibald Hughes

A Notary Public of New Jersey

CRMC-Motley1000-Subj-003723

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAULINE LASIN, administratrix ad prosequendum of the rights, goods, chattels and credits of JOHN LASIN, deceased,

Plaintiff,

vs.

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

Defendant.

On motion to quash summons and to dismiss complaint.

ORDER FOR DISCONTINUANCE

This matter coming on to be heard in the presence of the attorneys of the parties (Samuel Greenstone appearing for the plaintiff and Hobart & Minard appearing for the defendant) on the return of the rule to show cause allowed herein on March 7, 1930, why the summons should not be quashed and the complaint dismissed on the grounds stated in said rule, and it appearing that a copy of said rule was duly served upon the plaintiff, and the plaintiff's attorney, within the time and in the manner required by said rule; and the attorney of the plaintiff having stated in open court that although he had been properly retained and authorized to commence the above action, he did not desire to continue it against the present wishes of his client and would therefore consent to a discontinuance of the same;

ORDERED, that said action be and the same is hereby discontinued without costs.

DATED: April 14 1930.

George L. Bake
U. S. D. J.

Rule entered this 15 day of April, 1930 on motion of

Hobart & Minard
Attorneys of Defendant

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