IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

FILED
M. June 23 1969
James R. Cooney, Clerk, U. S. Court
By Myra Barton DEPUTY

SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.

CIVIL ACTION NO. 6329

ORIGINAL ANSWER OF DEFENDANT PHILIP CAREY CORPORATION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Philip Carey Corporation, one of the defendants herein, and for answer to plaintiff's complaint says:

FIRST DEFENSE

The complaint fails to state a claim against your defendant upon which relief may be granted, and, therefore, should be dismissed.

SECOND DEFENSE

1. Your defendant admits the allegations of paragraph (1) of the complaint.

2. Your defendant admits the allegations of paragraph (2) of the complaint.

3. Your defendant admits the allegations of paragraph (3) of the complaint.

4. Your defendant admits the allegations of paragraph (4) of the complaint.

5. With respect to the allegations of paragraph (5) of the complaint, your defendant says that it is without knowledge or information sufficient to form a belief as to the truth thereof and, therefore, denies the same.

6. With respect to the allegations of paragraph (6) of the complaint, your defendant says that it is without knowledge or information sufficient to form a belief as to the truth thereof and, therefore, denies the same.

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7. With respect to the allegations of paragraph (7) of the complaint, your defendant denies the same.

8. With respect to the allegations of paragraph (8) of the complaint, your defendant denies the same.

9. With respect to the allegations of paragraph (9) of the complaint, your defendant denies the same.

10. With respect to the allegations of paragraph (10) of the complaint, your defendant says that it is without knowledge or information sufficient to form a belief as to the truth thereof and, therefore, denies the same.

11. With respect to the allegations of paragraph (11) of the complaint, your defendant says that it is without knowledge or information sufficient to form a belief as to the truth thereof and, therefore, denies the same.

12. With respect to the allegations of paragraph (12) of the complaint, your defendant says that it is without knowledge or information sufficient to form a belief as to the truth thereof and, therefore, denies the same.

13. With respect to the allegations of paragraph (13) of the complaint, your defendant denies the same.

14. With respect to the allegations of paragraph (14) of the complaint, your defendant denies the same.

15. With respect to the allegations of paragraph (15) of the complaint, your defendant denies the same.

WHEREFORE, premises considered, your defendant prays that on a hearing that plaintiff take nothing and that your defendant go hence and recover its costs.

FULBRIGHT, CROOKER, FREEMAN, BATES & JAWORSKI

By: _____

Bank of the Southwest Building
Houston, Texas 77002
Attorneys for defendant Philip Carey Corporation

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I, W. N. Arnold, Jr., one of the attorneys of record for the defendant, Philip Carey Corporation, hereby certify that a true and correct copy of the above and foregoing answer was on this the 20 day of June, 1969, mailed to Messrs. Stephenson, Thompson and Morris, P. O. Box 68, Orange, Texas, 77630, attorneys of record for the plaintiff, by mailing same through the United States mail properly stamped and addressed as above.

W. N. Arnold, Jr.

Attorney for defendant
Philip Carey Corporation

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ET AL.

ORIGINAL ANSWER OF DEFENDANT
PHILIP CAREY CORPORATION

FULBRIGHT, CROOKER, FREEMAN, BATES & JAWORSKI
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