FILED

JUL 18 1969

James R. Cole[illegible], Clerk, U. S. Court

By Margaret Driver DEPUTY

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

SAMUEL R. POTTER :

VS. : CIVIL NO. 6329

FIBREBOARD PAPER PRODUCTS :
CORPORATION ET AL :

PLAINTIFF'S ANSWERS TO WRITTEN INTERROGATORIES PROPOUNDED BY PITTSBURGH CORNING CORPORATION

TO: PITTSBURGH CORNING CORPORATION, Defendant, and its attorneys of record, Wells, Duncan, Beard, Greenberg and Hunt, 515 Beaumont Savings Bldg., Beaumont, Texas:

Comes now the plaintiff and in answer to the written interrogatories propounded to him by defendant, Pittsburgh Corning Corporation, and would say the following:

(1) I will attempt to answer this entire question by the years:

1940-1942

During this period of time, I worked for Todd Galveston Drydocks, Galveston, Texas, and while working there, I worked around and with Johns-Manville products and Eagle-Picher products containing asbestos. I worked with Asbestos Cement #352 and 85% magnesia; Eagle-Picher #66 (power house cement); also, Johns-Manville's Hitemp. I also worked with an asbestos roping.

1942-1943-1944

During this time, I worked at the Consolidated Shipyards in Orange, Texas, but I cannot recall the name of my employer at this time. However, I worked around and with Johns-Manville products again, and also Eagle-Picher #66 cement. I also worked with an amosite product that was in blanket form containing asbestos, but I can't recall the name of the manufacturer. I also worked with asbestos roping. My employer was Asbestos Magnesia Material Company.

Oct. 1944 to Feb., 1945

During this time, I returned to work for Todd Galveston Drydocks, Galveston, Texas, and worked with Johns-Manville products and Eagle-Picher products containing asbestos. I worked with Asbestos Cement #352 and 85% magnesia; Eagle-Picher #66 power house cement and also Johns-Manville's Hitemp. I also worked with an asbestos roping.

1945

For about two or three months in 1945, I worked at the Mare Island Navy Shipyard in Valejo, California, and I was working for the United States Navy. While working on this job, I worked with Johns-Manville products and Eagle-Picher #66, and this amosite product in blanket form which I cannot recall the manufacturer of.

Mar. 1946 to May, 1947

During this period of time, I worked for American Potash and Chemical Corporation in Trona, California at their plant, and while working there, I worked with Johns-Manville products and Eagle-Picher #66.

May, 1947 through 1953

During this period of time, I cannot recall each and every employer; I do not have my check stubs or W-2 Forms for these years, but I will endeavor to state the ones I can remember.

I remember that I worked for Fuller and Austin at the Port Neches Texaco plant on a short job; and I worked with Johns-Manville products, including #352 cement and 85% magnesia.

I worked for B & B Engineering at the Pure Oil Plant in Port Neches, and I worked with Unibestos and also Johns-Manville products; this was also a short job.

I worked for Gulf States Utilities Power House in Beaumont, for B & B Engineering Company, and I worked with this amosite product containing asbestos, asbestos cloth that I believe is manufactured by Johns-Manville, and Johns-Manville's 85% magnesia.

I also worked at the Texaco plant in Port Arthur, but I can't recall the name of my employer. I worked with Johns-Manville products, including 85% magnesia and #352 cement.

I worked for Neches Insulation Company at Gulf Sulphur Company in Beaumont, and various other places, and I worked with 85% magnesia made by Johns-Manville and I believe Careytemp, and there could have been other products that I can't recall at this time.

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1954

I worked for B & B Engineering Company at the DuPont plant in Orange, Texas, and I worked with Johns-Manville products, Kaylo, and Owens-Corning finishing cement. And I also worked with R & I Refractory products, and Ruberoid Company products.

I worked for Brown Insulation Company at the Ford Company in Dearborn, Michigan, and I worked with Johns-Manville products.

I worked for Johns-Manville Sales Corporation, but I can't recall the job site, but while working for them, I worked with Johns-Manville products. Sometimes when I worked for Johns-Manville Sales Corporation, I also worked with other company's products, but I can't recall about this particular job.

I worked for The Aber Company, I believe at the Jefferson Chemical Company in Port Neches, Texas, and I worked with Unibestos and Johns-Manville products, Careytemp.

I worked for M.W. Kellogg Company at some plant at West Lake, Louisiana, but I can't recall the name of the plant. I worked with Kaylo and Owens-Corning Finishing cement.

1955

I worked for Sabine Insulation Company and it could have been on more than one job site. I believe that I worked mostly with Johns-Manville products.

I worked for Sprinkmann Sons Corporation at the light and power company in Milwaukee, Wisconsin. I worked with Careytemp and several other products containing asbestos, but I can't recall the name of the manufacturers.

I worked for Asbestos Products, Inc. at Lyon Oil Company at South St. Paul, Minn., and I worked with Kaylo and Johns-Manville products.

I worked for B & B Engineering Company at the DuPont plant in Orange, and I worked with Johns-Manville products, Kaylo and Owens-Corning finishing cement, and R & I Refractory products, and also Ruberoid Company products.

I worked for Fuller and Austin Insulating Company at the City Service Refinery in West Lake, Louisiana, and I worked with Johns-Manville products.

I worked for M.W. Kellogg Company, but I don't recall the job site or the materials I used.

I worked for North Brothers in Aiken, South Carolina at the H-Bomb Plant, and I worked with Johns-Manville products.

1956

I worked for Johns-Manville Sales Corporation at Muskegen, Michigan, at the power house, and I worked with Johns-Manville products.

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I worked for Johns-Manville Sales Corporation in Beaumont, Texas, but I don't recall the job site. I know I worked with Johns-Manville products.

I worked for Armstrong Contracting & Supply Company at the Firestone Plant in Orange, Texas, and I worked with Kaylo and Johns-Manville products and probably other products containing asbestos manufactured by other companies, including Armstrong Company, and also Ruberoid Company products.

I worked for Service Erection, but I don't recall where and can't recall what products I used.

I worked for Fuller and Austin, in Lake Charles, Louisiana, at City Service plant, and I worked with Kaylo and Johns-Manville products.

I worked for Sabine Insulation Company on a short job and it was at some plant on Chemical Row in Orange. I can't recall what products I used.

I worked for Mundet Cork Company in Orange at some plant on Chemical Row. I can't recall what products I used.

I worked for Carl J. Krez Company in Chicago Heights in the Ford Stamping Mill, and I worked with Johns-Manville products, and also I believe I used Kaylo.

I worked for Parham Pearce, Inc. in Dearborn, Michigan, [illegible] at the McClaw Steel plant, and I worked with Johns-Manville products.

1957

I worked for Armstrong Cork Company in Orange, Texas, at the Firestone Plant, and I worked with Kaylo and Johns-Manville products, and I believe some Armstrong products containing asbestos, and also Ruberoid Company products.

I worked for Allied Insulating Company in West Lake, Louisiana, at the Continental Oil Company, and I worked with Kaylo and Owens-Corning finishing cement.

I worked for Fuller and Austin in West Lake, Louisiana, at the City Service Plant, and I worked with Kaylo, Johns-Manville products, and Careytemp.

1958

I worked for Fuller and Austin, at Placamine, Louisiana, at an oil company plant, and I worked with Kaylo, Johns-Manville products, Careytemp, Unibestos. Also, I didn't use Eagle-Picher products on this job, but other men on the job were using their products.

I worked for Thorpe Insulating Company during this year, but I'm not certain whether this was the Courthouse job in Orange, or not.

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I worked for B & B Engineering Company at the DuPont plant in Orange, Texas, and I worked with Johns-Manville products and Kaylo, and R. & I. Refractory products and also Ruberoid Company products.

1959

I worked for Armstrong Contracting and Supply Company on two different jobs: Firestone plant in Orange, Texas, and I believe on Olin Chemical Company in West Lake, Louisiana. I worked with Kaylo and Armstrong products containing asbestos, and Ruberoid Company products.

1960.

I worked for Armstrong Contracting and Supply Company at the Firestone Plant in Orange, Texas, and I worked with Armstrong products containing asbestos, Kaylo, and Ruberoid Company products.

I worked for The Fluor Corporation at Kaplan, Louisiana, on the Cow Island job, and I worked with Kaylo and Johns-Manville products.

I worked for The Fluor Corporation at Rein, Louisiana, but I don't remember the name of the plant. I worked with Kaylo and Johns-Manville products.

1961

I worked for Coastal Paint & Insulating Corporati4n in Texas City, Texas, at the Dow Chemical plant, and I worked with Kaylo and Johns-Manville Hitemp, and an asbestos cement.

I worked for Sabine Insulation Company at Johnspn's Bayou at some pumping plant job, and I worked with Johns-Manville products.

I worked for The Aber Company at the Gulf States Power House in Bridge City, Texas, and I worked with Kaylo and Armstrong products containing asbestos, and asbestos finishing cement, and Careytemp. There were many other employees on this job using various other products.

1961

I worked for B & B Engineering at the DuPont Plant In Orange, Texas, and I worked with Kaylo, Johns-Manville products. Also R & I Refractory products and Ruberoid Company products.

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I worked for Armstrong Contracting and Supply Company at the Firestone plant in Orange, Texas, and I worked with Armstrong products containing asbestos, Kaylo and asbestos finishing cement, and Ruberoid Company products.

1962

I worked for Armstrong Contracting and Supply Company at the Firestone plant in Orange, Texas, and I worked with Armstrong products containing asbestos, Kaylo and asbestos finishing cement, and Ruberoid Company products.

I worked for B & B Engineering Company at the DuPont plant in Orange, Texas, and I worked w6th Johns-Manville products, Kaylo and asbestos finishing cement, and also R & I Refractory products and Ruberoid Company products.

I worked for Johns-Manville Sales Corporation at the Gulf States Power House in Bridge City, Texas, and I worked with Johns-Manville products, and also other employees were using various other products.

I worked for Service Erection Company, but it was a short job, and I can't recall where the job was or the products I used.

1963

I worked for Armstrong Contracting and Supply Company at the Firestone Plant in Orange, Texas, and I worked with Armstrong products containing asbestos, Kaylo and asbestos finishing cement, and also Limpet spray (containing asbestos). And also Ruberoid Company products.

I worked for Thorpe Insulation Company in West Conova, California, at a plant that manufactured surgical plastic gloves and syrings, etc., and I worked with Johns-Manville products, and I believe Pabco products.

I worked for Owens-Corning Fiberglas Corporation in Modota, California at Spreckles Sugar Refinery, and I worked with Kaylo and Owens-Corning products containing asbestos, and I believe Pabco products.

I worked for Industrial Insulators,Inc. at the Jefferson Chemical plant in Port Neches, Texas, and I worked with Unibestos, Kaylo and asbestos cement, and Careytemp.

I worked for B & B Engineering Company at the DuPont plant in Orange, Texas, and I worked with Johns-Manville products, Kaylo and asbestos cement, R & I Refractory products and Ruberoid Company products.

I worked for Sabine Insulation Company Phillips Carbon black plant in Orange, Texas, and I worked with Kaylo, and asbestos cement.

I worked for Johns-Manville Sales Corporation at a small job in Orange, and I worked with Johns-Manville products.

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1964

I worked for Fuller and Austin at the Olin Mathison Chemical Company in West Lake, Louisiana, and I worked with Kaylo and asbestos cement.

I worked for B & B Engineering Company at DuPont plant in Orange, and I worked with Kaylo, Johns-Manville, and asbestos cement., R & I Refactory and Ruberoid Companies products.

I worked for Catalytic Construction Company at one of the plants on Chemical Row, and I worked with Kaylo and Johns-Manville products and asbestos cement.

I worked for Hickory Construction Company on a short job, but I can't recall the name of the job site or the products I used.

I worked for Johns-Manville Sales Corporation but I do not recall the job site, but I worked with Johns-Manville products.

I worked for Fuller and Austin in Houston, Texas, at Chocolate Bayou, and I worked with Kaylo and asbestos cement.

I worked for The Aber Company in Houston, Texas, but I don't recall the name of the plant; I worked with Johns-Manville products, and Careytemp.

I worked for Armstrong Contracting & Supply Company at the Firestone plant in Orange, and I worked with Armstrong products containing asbestos, and I believe with Kaylo, and Ruberoid Company products.

I worked for Owens-Corning Fiberglas Corporation on a very short job, and I don't recall where it was located.

I worked for The Isotherm Company in Santa Barbara, California, on a pumping plant job, and I worked with Pabco products - 85% magnesia and Caltemp and cement.

1965

I worked for Sabine Insulation Company at Levingston Shipbuilding, Phillips carbon black plant, Orange Memorial Hospital, Gulf States power house, in Orange, Texas, and I worked with Johns-Manville products, Kaylo, and I worked around other employees using various other products.

I worked for B & B Engineering Company at the Gulf States PowerHouse, Bridge City, Texas, and I worked with Kaylo, Johns-Manville products and other employees were using various other products.

I worked for Catalytic Construction Company but I don't recall the job site.

I worked for Fuller and Austin at some chemical plant in West Lake, Louisiana, and I worked with Kaylo and asbestos cement.

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1966

I worked for Fuller and Austin but I can't recall the job site.

I worked for B & B Engineering Company on a short job, but I can't recall the job site.

I worked for Sabine Insulation Company almost the entire year, and I worked on several jobs, including the Spencer Chemical Company, Orange, Texas. I worked with Kaylo, Johns-Manville products, I believe some Unibestos, Eagle-Picher products, and I believe Careytemp.

1967

I worked for Fuller and Austin at Gulf-Goodrich Chemical, Orange, Texas, and I worked with Kaylo and asbestos cement, and I don't recall whether Johns-Manville products were used or not.

I worked for Sabine Insulation Company at Spencer Chemical Company, Orange, Texas, and I used Unibestos, Eagle-Picher products, Careytemp, Kaylo and Johns-Manville products.

I worked for Babcock and Wilcox at the Owens-Illinois paper mill in Orange, Texas, and I used Kaylo and asbestos cement.

In addition to the products I have mentioned above, I specifically recall that I also worked around products manufactured by a company called Standard Asbestos Company. I know I have used their products many times, and I believe I have used them on jobs where I was working at the DuPont Plant in Orange, and on the various jobs where I was working for Armstrong. I may have also used Standard Asbestos products on other jobs. I believe that Fuller and Austin used their products, and also Sabine Insulation Company. I am going to refresh my memory in this regard.

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(2) This question would be impossible to answer, for the reason that on many, many jobs on which I worked, there were other contractors and sub-contractors on the same job, and their employees were also using insulating products containing asbestos, but I could not state with certainty what specific products they were using, but I know that I inhaled dust from these products.

(3) Yes.

(4) I am a member of the Asbestos Workers Local Union No. 112, Lake Charles, Louisiana. I joined this local in 1953.

(5) Yes.

(6) When I worked for employers at the DuPont Plant, I believe face masks or respirators were available if you requested them; however, they were uncomfortable and were not effective and I couldn't work with them on and didn't request them.

(7) I have tried to wear them, but because they would fog up my glasses, they were hot, I could not breath in them, the dust collected in my nose and mouth, I did not wear them but for a short time.

(8) No.

(9) No answer requested.

(10) On very few occasions, I worked in the shop at DuPont Plant in Orange, while I worked for B & B Engineering Company, and DuPont provided a suction fan on the saw.

(11) I will attempt to answer this question to the best of my recollection.

I saw Dr. Richmond, in Orange, Texas, sometime during World War II, but I don't recall the date. He treated me for pneumonia and chicken pox.

I was treated in 1948 by some doctor in Beaumont, Texas, for hemorrhoids. He performed an operation on me at the Beaumont City Hospital.

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I was also treated by Dr. Victor Watson from about the year 1954 until about the year 1966. I saw him on various occasions, but I don't recall the dates. He treated me for pneumonia and bronchitis, colds, lung congestions.

I have been treated by Dr. C. B. Shaddock, of Orange, Texas, from about the year 1966 to the present time. I saw him on various occasions, but I don't recall the dates. I am seeing him now about every sixty days. He has treated me for pneumonia, bronchitis, colds, lung congestions, lung infections, and asbestosis.

I have been examined by Dr. D. C. Jenkins, in Houston, Texas, and his staff, during the month of July, 1967. I underwent various tests and examinations by his entire staff and Baylor University Hospital.

I may have during the years 1940 to the present time been seen by one or two other doctors that I can't remember at this time.

I recall that I was seen by Dr. Hume, in Bridge City, Texas, but I don't recall the date. He saw me for several times but never reached a diagnosis as to my trouble.

(12) I was in Lutcher Ann Hospital in Orange on two occasions but I don't recall the dates. I had pneumonia once, and the other time was for some trouble in my jaw.

I was in Orange Memorial Hospital on about two occasions, each time for pneumonia or lung infection.

I was in St. Elizabeth Hospital in Beaumont about five or six years ago for some trouble I was having with my head, but I don't know the name of the trouble.

I was in Beaumont City Hospital in 1948, or 1949, for a hemorrhoid operation.

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I was in Baylor University Hospital in Houston, Texas, in 1967, for extensive tests and examinations. I had been referred to Dr. Jenkins by Dr. Shaddock, and the results of these tests and examinations were sent to Dr. Shaddock and he later told me I was suffering from asbestosis.

(13) (a) I believe I have covered this in No. 11 and 12, except for small injuries on the job, such as getting something in my eye, etc.

(b) See my answers to questions No. 11 and 12. I am also suffering from the disease of asbestosis.

(c) The disease of asbestosis occurred from my years of employment working around products containing asbestos.

(d) See answers to Questions No. 11 and 12.

(e) I recovered the amount of $7,500.00 in January, 1969, growing out of my compensation claim for the occupational disease of asbestosis.

(14) Yes.

(a) Cigarettes.

(b) Two.

(c) One.

(d) Yes.

(e) I have tried; I cut my smoking in half.

(15) 1959: I only have one W-2 Form for this year; and this one amounts to $2,671.42.

1960: $4,447.10.

1961: $7,893.95.

1962: $8,102.94.

1963: $4,878.48.

1964: $5,753.71.

1965: I cannot locate this return or any W-2 Forms.

1966: $7,197.00.

1967: -$1,665.00.

1968: I did not work this year.

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(16) One. Cause No. B-16,773, District Court of Orange County, Texas, styled SAMUEL R. POTTER VS. THE CHARTER OAK FIRE INSURANCE COMPANY.

(17) Yes.

(18) I am receiving Social Security benefits for total disability growing out of the disease of asbestosis. I receive the amount of $307.00 per month because I have a minor son and a wife. I began receiving Social Security benefits in 1967, I believe, and I am still receiving these benefits.

(19) No.

(20) No answer required.

(21) I never knew that the products I was working with were dangerous in all the years that I worked as an insulator; I was never warned by anyone that these products were harmful to my lungs and body in general; no one ever made any effort to protect me from the dusts and fibers created by the handling and application of these products; I was never furnished with any type of protective equipment or appliance which could be worn; I relied upon the fact that the products I was using were safe because they were on the market.

(22) None whatsoever.

S. R. Potter
SAMUEL R. POTTER

SWORN TO AND SUBSCRIBED before me this 17th day of July, 1969.

Jackie Bean
NOTARY PUBLIC, ORANGE COUNTY, TEXAS.

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CERTIFICATE OF SERVICE BY MAIL

I, Ward Stephenson, hereby certify that a true and correct copy of the foregoing instrument was on this the 17 day of July, 1969, mailed to the following named attorneys for the defendants, by certified mail, return receipt requested:

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