VINSON, ELKINS, SEARLS & CONNALLY
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FIRST CITY NATIONAL BANK BUILDING
HOUSTON, TEXAS 77002

FILED
AUG 27 1969
James R. Cooney, Clerk, U. S. Co
By Loregene R Jones
DEPUTY

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

SAMUEL R. POTTER

V.

FIBER BOARD PAPER PRODUCTS CORPORATION, ET AL

CIVIL ACTION NO. 6329

DEFENDANT'S ORIGINAL ANSWER

TO THE SAID HONORABLE COURT:

COMES NOW the defendant, Standard Asbestos Manufacturing and Insulation Company, in this cause and for answer to plaintiff's petition would show:

1.

The jurisdiction of the Court is admitted.

2.

All the other allegations are denied and strict proof is demanded.

3.

Alternatively no accidental injury under the law was sustained.

4.

Any injury sustained is of a temporary total nature and plaintiff has recovered; or the temporary total disability was followed by temporary partial disability from which plaintiff has or will recover; or the temporary partial disability was followed by a small per cent of permanent partial disability.

WHEREFORE, having answered, defendant prays for costs and for general relief.

VINSON, ELKINS, SEARLS & CONNALLY

BY: Jo Heath

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

CIVIL ACTION NO. 6529

SAMUEL R. POTTER

V.

FIBER BOARD PAPER PRODUCTS CORPORATION, ET AL

ORIGINAL ANSWER OF DEFENDANT, STANDARD ASBESTOS MANUFACTURING AND INSULATION COMPANY

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