IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED

SEP 2 1969

James R. Cooney, Clerk, U. S. Court

By Mildred C. Verret DEPUTY

SAMUEL R. POTTER §

§

VS. § CIVIL ACTION NO. 6329

§

FIBREBOARD PAPER PRODUCTS §
CORPORATION, ET AL §

ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Standard Asbestos Manufacturing and Insulating Company, one of the defendants in the above styled and numbered cause, and in answer to the complaint filed against said defendant herein, would respectfully represent unto the Court the following:

I.

This defendant admits the allegations contained in Paragraph I of Plaintiff's complaint.

II.

This defendant admits the allegations contained in Paragraph II of Plaintiff's complaint.

III.

This defendant admits the allegations contained in Paragraph III of Plaintiff's complaint.

IV.

This defendant admits the allegations contained in Paragraph IV of Plaintiff's complaint.

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V.

This defendant neither admits nor denies the allegations contained in Paragraph V of Plaintiff's complaint for lack of information.

VI.

This defendant neither admits nor denies the allegations contained in Paragraph VI of Plaintiff's complaint for lack of information.

VII.

This defendant denies the allegations contained in Paragraph VII of Plaintiff's complaint.

VIII.

This defendant denies the allegations contained in Paragraph VIII of Plaintiff's complaint.

IX.

This defendant denies the allegations contained in Paragraph IX of Plaintiff's complaint.

X.

This defendant denies the allegations contained in Paragraph X of Plaintiff's complaint.

XI.

This defendant denies the allegations contained in Paragraph XI of Plaintiff's complaint.

XII.

This defendant neither admits nor denies the allegations contained in Paragraph XII of Plaintiff's complaint for lack of information.

The Potter v. Fibreboard Case File (1969-1972), Answer
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XIII.

This defendant denies the allegations contained in Paragraph XIII of plaintiff's complaint.

XIV.

This defendant denies the allegations contained in Paragraph XIV of Plaintiff's complaint.

XV.

This defendant denies the allegations contained in Paragraph XV of Plaintiff's complaint.

WHEREFORE, PREMISES CONSIDERED, this defendant prays that upon final trial and hearing hereof plaintiff take nothing as against this defendant and that the defendant go hence without day, recovering its costs, and for general relief.

Respectfully submitted,

MEHAFFY, WEBER, KEITH & GONSOULIN
Attorneys for The Defendant,
Standard Asbestos Manufacturing
and Insulating Company

By _____
Of Counsel

1400 San Jacinto Building

Beaumont, Texas

A copy of the foregoing instrument has been forwarded to the attorney of record for the plaintiff.

_____
James W. Mehaffy

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