IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
JAN 7 1970
JAMES R. COONEY, CLERK
BY DEPUTY Maya Barton

SAMUEL R. POTTER	)	
	)	
VS.	)	CIVIL ACTION NO. 6329
	)	
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL	)	

ANSWER OF DEFENDANT UNARCO INDUSTRIES, INC. TO THE CROSS-ACTION OF DEFENDANT PHILIP CAREY CORPORATION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Unarco Industries, Inc., one of the Defendants herein, and files this its Original Answer to the Cross-Action of the Defendant, Philip Carey Corporation, and would respectfully show unto the Court and Jury the following:

I.

As to the allegations contained in the Cross-Action of Defendant Philip Carey Corporation, this Defendant denies all the allegations contained in said Cross-Action.

II.

For further answer herein, and for affirmative answer, this Defendant hereby adopts in toto and incorporates herein its Original Answer to Plaintiff's Complaint, the same as though set forth herein verbatim.

WHEREFORE, this Defendant having answered, prays judgment of the Court that the Defendant, Philip Carey Corporation, take nothing by its Cross-Action and that this

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Defendant and Cross-Defendant go hence without day for its cost and for such other and further relief as it may show itself justly entitled.

Respectfully submitted,

VINSON, ELKINS, SEARLS & CONNALLY

By: Gerald P. Coley

Gerald P. Coley
First City National Bank Bldg.
Houston, Texas 77002 - 225-2411

ATTORNEYS FOR UNARCO INDUSTRIES, INC.

CERTIFICATE OF SERVICE

A true and correct copy of the above and foregoing Answer of Defendant Unarco Industries, Inc. was on this the 5th day of January, 1970, served upon counsel for Defendant, Philip Carey Corporation, plaintiff's counsel and all Defendants by depositing same in the United States mail, postage prepaid.

Gerald P. Coley

The Potter v. Fibreboard Case File (1969-1972), Answer to Philip Carey's cross-action
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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
JAN 7 1970
JAMES R. COONEY, CLERK
BY DEPUTY Myra Barton

SAMUEL R. POTTER)
)
VS.) CIVIL ACTION NO. 6329
)
FIBREBOARD PAPER PRODUCTS)
CORPORATION, ET AL)

ANSWER OF DEFENDANT UNARCO INDUSTRIES, INC. TO THE CROSS-ACTION OF DEFENDANT RUBEROID COMPANY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Unarco Industries, Inc., one of the Defendants herein, and files this its Original Answer to the Cross-Action of the Defendant, Ruberoid Company, and would respectfully show unto the Court and Jury the following:

I.

As to the allegations contained in the Cross-Action of Defendant Ruberoid Company, this Defendant denies all the allegations contained in said Cross-Action.

II.

For further answer herein, and for affirmative answer, this Defendant hereby adopts in toto and incorporates herein its Original Answer to Plaintiff's Complaint, the same as though set forth herein verbatim.

WHEREFORE, this Defendant having answered, prays judgment of the Court that the Defendant, Ruberoid Company, take nothing by its Cross-Action and that this

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Defendant and Cross-Defendant go hence without day for its cost and for such other and further relief as it may show itself justly entitled.

Respectfully submitted,

VINSON, ELKINS, SEARLS & CONNALLY

By: Gerald P. Coley

Gerald P. Coley
First City National Bank Building
Houston, Texas 77002 - 225-2411
ATTORNEYS FOR DEFENDANT, UNARCO INDUSTRIES, INC.

CERTIFICATE OF SERVICE

A true and correct copy of the above and foregoing Answer of Defendant Unarco Industries, Inc. was on this the 5th day of January, 1970, served upon counsel for Defendant, Ruberoid Company, plaintiff's counsel and on all Defendants by depositing same in the United States mail, postage prepaid.

Gerald P. Coley

Gerald P. Coley

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CIVIL ACTION NO. 6329

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

SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

ANSWER OF DEFENDANT UNARCO INDUSTRIES, INC. TO THE CROSS-ACTION OF DEFENDANT RUBEROID CO.

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