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

SAMUEL R. POTTER	§	
	§	
VS.	§	C. A. NO. 6,329
	§	
FIBREBOARD PAPER PRODUCTS CORP., ET AL	§	
	§	

ANSWERS AND OBJECTIONS OF
DEFENDANT, EAGLE-PICHER INDUSTRIES, INC.,
TO PLAINTIFF'S INTERROGATORIES

Now comes Defendant, EAGLE-PICHER INDUSTRIES, INC., and pursuant to the applicable Federal Rules of Civil Procedure, files herewith its Answers and Objections to the second set of interrogatories heretofore propounded by the Plaintiff, as follows:

1. This interrogatory is not applicable to Defendant, EAGLE-PICHER INDUSTRIES, INC., as this Defendant did not so indicate in its answers to the Plaintiff's first set of interrogatories.

2. See Answer to Interrogatory No. 1.

3. See Answer to Interrogatory No. 1.

4. See Answer to Interrogatory No. 18 of first set of interrogatories.

5. Defendant, EAGLE-PICHER INDUSTRIES, INC., objects to this interrogatory on the ground that the Plaintiff is inquiring into medical facts which will necessarily have to be developed through expert testimony at the time of the trial, and therefore, this interrogatory is argumentative and improper, as this Defendant should not be called upon to answer a question such as this calling for such a medical conclusion which is also one of the ultimate issues to be tried in this case.

ROYSTON, RAYZOR & COOK

By _____
877 San Jacinto Building
Houston, Texas 77002
Attorneys for Defendant,
Eagle-Picher Industries, Inc.

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THE STATE OF TEXAS

COUNTY OF HARRIS

BEFORE ME, the undersigned authority, personally appeared Ben L. Reynolds, attorney for Defendant in the captioned matter, and stated that the foregoing Answers and Objections to Interrogatories are true and correct based upon information and belief.

Ben L. Reynolds

SUBSCRIBED AND SWORN TO BEFORE ME, on this 2nd day of February, 1970.

Notary Public in and for
Harris County, Texas

CERTIFICATE OF SERVICE

I certify that copies of the foregoing Answers to Interrogatories were mailed to Attorney for the Plaintiff, Ward Stephenson, Stephenson Building, Orange, Texas, and to other Attorneys of Record, this 2ND day of February, 1970.

Of Royston, Rayzor & Cook

The Potter v. Fibreboard Case File (1969-1972), Answers and objections to plaintiff's interrogatories
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ANSWERS AND OBJECTIONS
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ROYSTON, RAYZOR & COOK
ATTORNEYS AT LAW
SAN JACINTO BUILDING
HOUSTON, TEXAS

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