FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
FEB 16 1970
JAMES R. COONEY, CLERK
BY DEPUTY

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

S. R. POTTER :

VS. : CIVIL NO. 6329

FIBREBOARD PAPER PRODUCTS :
CORPORATION ET AL :

THIRD SET OF WRITTEN INTERROGATORIES PROPOUNDED TO DEFENDANT OWENS-CORNING FIBERGLASS CORPORATION

TO: Defendant Owens-Corning Fiber Glass Corporation, c/o Mr. Dale Dowell, 707 Beaumont Savings Building, Beaumont, Texas 77701, Attorney for said Defendant:

S. R. POTTER, plaintiff, hereby serves upon the above named defendant the following written interrogatories to be answered fully and fairly in writing under oath, which shall be signed by the person or persons making such answers, a copy of such answers to be served upon plaintiff's attorney within fifteen (15) days after service herein, in accordance with Rule 33 of the Federal Rules of Civil Procedure:

1.

What studies has Owens-Corning Fiber Glass Corporation made itself or through its employees or by or under its direction concerning the effects of inhalation of asbestos dust brought about by the use of any products containing asbestos manufactured by Owens-Corning upon the workers and insulators applying such of your products as contain asbestos?

2.

In the previous Interrogatory #3 you listed (A) through (G) as studies having been made. Please state whether or not these studies were made by Owens-Corning or under its direction or supervision or at its request and whether or not Owens-Corning had any part in prompting or sponsoring the studies which you mention in your answer to Interrogatory #3. If you say that Owens-Corning did participate, sponsor or have any part in such studies, please state what Owens-Corning did in that regard.

3.

Has your company done any studies or has your company conducted any studies concerning the effects of inhalation of

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asbestos dust or fibers by one using or being exposed to any of the asbestos materials manufactured by your company? In answer to this question, please give the date and nature of your studies, if any, the name or names of the persons conducting the studies and their address, what the purpose of the studies were, showing to whom such report was given and when.

4.

Have you or any of your employees conducted studies designed to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the name or names of such persons conducting such studies, by whom they were made, and to whom they were given, and when, and state what action, if any, was taken based upon such studies in an effort to minimize or eliminate the effects of inhalation of asbestos dust or fibers upon those using or being exposed to the dust and fibers contained in such products as manufactured by your company.

STEPHENSON AND THOMPSON

By Ward Stephenson
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

CERTIFICATE OF SERVICE BY MAIL

I, Ward Stephenson, hereby certify that a true and correct copy of the foregoing interrogatories was on this 12th day of February, 1970, mailed to Mr. Dale Dowell, 707 Beaumont Savings Building, Beaumont, Texas 77701, Attorney for Defendant Owens-Corning Fiberglass Corporation.

Ward Stephenson
Ward Stephenson

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