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

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MAR 2 1970
JAMES R. COONEY, CLERK
BY DEPUTY Myra Burton

S. R. POTTER :

VS. : CIVIL NO. 6329

FIBREBOARD PAPER PRODUCTS :
CORPORATION ET AL :

THIRD SET OF WRITTEN INTERROGATORIES
PROPOUNDED TO DEFENDANT JOHNS-MANVILLE
PRODUCTS CORPORATION

TO: Defendant Johns-Manville Products Corporation, c/o Gordon R. Pate, 1119 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.

Please give us the name or names of such persons connected with Johns-Manville Products Corporation in their research department who are working on the Insulation Industry Hygiene Research Program under the direction of Dr. Selikoff at Mount Sinai School of Medicine in the City of New York. Plaintiff understands this program was launched in October 1968 and wishes to have the names, addresses and such information concerning the identity of the Johns-Manville Products Corporation representative or representatives working in this field so as to be able to depose them.

2.

Plaintiff understands that Johns-Manville research scientists have been working on a new and more efficient filtering media for face masks to be worn by insulation workers and that Johns-Manville has licensed one or more

Published by AsbestosClaims.Law
asbestosclaims.law/library/10496/1

mask manufacturers. Please give the name and address and such details as will enable plaintiff to depose the person or persons in charge of this program with Johns-Manville.

STEPHENSON AND THOMPSON

By Ward Stephenson
Attorneys for Plaintiff
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 the 27th day of February, 1970, mailed to Mr. Gordon R. Pate, 1119 Beaumont Savings Building, Beaumont, Texas 77701, Attorney for Defendant Johns-Manville Products Corporation.

Ward Stephenson
Ward Stephenson

Published by AsbestosClaims.Law
asbestosclaims.law/library/10496/2