IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

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

SAMUEL R. POTTER §

V. § CIVIL ACTION NO. 6329

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL §

REPLY OF ARMSTRONG CORK COMPANY TO MOTION OF PLAINTIFF TO COMPEL ANSWERS TO FIRST SET OF INTERROGATORIES

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Armstrong Cork Company, one of the defendants in the above entitled and numbered cause, having been made a party defendant after depositions and a considerable bit of discovery has been had, and makes the following reply to the above motion:

I.

Your defendant, Armstrong Cork Company, has made truthful answers to the questions that it could answer; that it has leveled, what it believes to be valid objections to certain interrogatories under the applicable Rules of Civil Procedure; that these objections are now pending before this Honorable Court; that the defendant honestly believes that its objections are well taken, and in any event, after the Court has ruled on said objections this defendant says that it will comply with the orders of this Court.

WHEREFORE, PREMISES CONSIDERED, your defendant prays that the plaintiff's motion be in all things denied.

Respectfully submitted,

FULBRIGHT, CROOKER, FREEMAN, BATES & JAWORSKI

By _____
W. N. Arnold, Jr.
800 Bank of the Southwest Building
Houston, Texas 77002 224-7070

Attorneys for Defendant Armstrong Cork Company

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CERTIFICATE OF SERVICE

I Certify that a copy of the foregoing reply of defendant Armstrong Cork Company to motionof plaintiff to compel answers to first set of interrogatories was mailed to Mr. Ward Stephenson, Stephenson & Thompson, Stephenson Building, Orange, Texas, attorney for plaintiff, and to Mr. George E. Duncan, Mr. Dale Dowell, Mr. Gordon R. Pate, Mr. Ben L. Reynolds, Mr. James W. Mehaffy, Sr., Mr. Charles S. Pipkin, Mr. John G. Tucker, Mr. Gerald P. Coley and Mr. Robert E. Barnes, Jr., by mailing a copy of said reply to their respective addresses on the 13 day of May, 1970.

W. N. Arnold, JR.

The Potter v. Fibreboard Case File (1969-1972), Reply to plaintiff's motion to compel
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COURT FOR THE EASTERN DISTRICT
OF TEXAS, BEAUMONT DIVISION

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FIBREBOARD PAPER PRODUCTS
CORPORATION, ET AL

REPLY OF ARMSTRONG CORK COMPANY
TO MOTION OF PLAINTIFF TO COMPEL
ANSWERS TO FIRST SET OF INTERROG-
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