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

CLERK, U. S. DISTRICT COURT
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EASTERN DIST. OF TEXAS
BEAUMONT, TEXAS

* *

SAMUEL R. POTTER

VS. X CIVIL ACTION NO. 6328

FIBREBOARD PAPER PRODUCTS
CORPORATION, ET AL * *

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
AUG 30 1971
JAMES R. COONEY, CLERK
BY DEPUTY Beatrice A. Bryan

INTERROGATORIES PROPOUNDED TO PLAINTIFF BY DEFENDANT, STANDARD ASBESTOS MANUFACTURING & INSULATING COMPANY

TO: SAMUEL R. POTTER, PLAINTIFF, AND/OR HIS ATTORNEY, WARD STEPHENSON, STEPHENSON BUILDING, ORANGE, TEXAS.

Comes now Standard Asbestos Manufacturing & Insulating Company, Defendant in the above entitled and numbered cause, and hereby makes request and in accordance with Rule 33 of the Federal Rules of Civil Procedure, that Plaintiff make answer of the truth of all and each of the following relevant matters of fact in the above entitled and numbered cause:

Defendant further notifies you, in accordance with the aforesaid Rule 33 of the Federal Rules of Civil Procedure, that within a period of Thirty (30) days after the service of a copy hereof, upon you that you are to deliver to its attorneys of record, Mehaffy, Weber, Keith & Gonsoulin, 1400 San Jacinto Building, Beaumont, Texas, a duly sworn response to these Interrogatories.

In Plaintiff's answers to written interrogatories propounded by Pittsburgh-Corning Corporation, dated July 17, 1969, and particularly Interrogatory One (1), you listed by years the places where you had worked and the products containing asbestos to which you assert you were exposed. You listed

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these by years. Under the itemized years, you did not mention any products produced and manufactured by Standard Asbestos Manufacturing & Insulating Company. At the conclusion of this answer, you stated that you believed that you had worked around products manufactured by a company called Standard Asbestos Company, and that you were going to refresh your memory in this regard. In the light of your previous answer, please answer the following interrogatories:

1. Do you now recall specifically ever working at any particular time around products manufactured by Standard Asbestos Manufacturing & Insulating Company?

If your answer to Interrogatory No. 1 is "No," you will not be required to answer the remaining interrogatories. However, if your answer is in the affirmative, please answer the remaining interrogatories fully and fairly.

2. Please state the exact dates upon which you worked around such products.

3. For each occasion, give the name of your employer.

4. For each occasion, give the exact name of the product.

5. For each occasion, please state exactly how you recall that the product in question was manufactured by this Defendant, giving the exact period of time that you worked with such product on each occasion.

6. Please state the location of such work on each and every occasion.

7. In the answers to your interrogatories heretofore filed, you mention that you worked for the Fluor Corporation at Rayne, Louisiana, in 1960. You further state that at that time you worked with Kaylo and Johns-Manville products. Is it not

The Potter v. Fibreboard Case File (1969-1972), Interrogatories to plaintiff
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true that at this time these are the only two products that you specifically recall working with on that particular job?

8. In the answers to your interrogatories heretofore filed, you mention that you worked for the Fluor Corporation at Kaplan, Louisiana, on the Cow Island job, in 1960. You further state that at that time you worked with Kaylo and Johns-Manville products. Is it not true that at this time these are the only two products that you specifically recall working with on that particular job?

9. In the interrogatories which you previously answered, referred to above, you list your employers, and you also attached copies of W-2 forms. The only reference to employment by the Fluor Corporation was on the two jobs mentioned in the preceding two interrogatories during the year 1960. Do you at this time recall ever having worked for the Fluor Corporation on any other occasions, other than the two occasions in 1960 in the State of Louisiana. If so, please state exactly when you did work for the Fluor Corporation other than the two occasions mentioned above, on what job, where, stating the exact period of time that you were so employed by such company.

10. If you have stated that at any time you have a definite recollection of having worked around products of Standard Asbestos Manufacturing and Insulating Company, please state whether or not on that particular job you had any trouble with your lungs, how such trouble was manifested, describing such manifestation, if any, in exact detail.

DATED: August 27, 1971.

MEHAFFY, WEBER, KEITH & GONSOULIN

By _____
Of Counsel

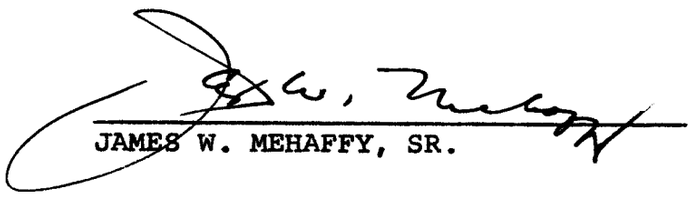
1400 San Jacinto Building
Beaumont, Texas 77701

Attorneys for Defendant, Standard Asbestos Manufacturing & Insulating Company

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Interrogatories of Defendant, Standard Asbestos Manufacturing & Insulating Company, was mailed by certified mail, return receipt requested, on this the 27th day of August, 1971, to Mr. Ward Stephenson, Stephenson & Thompson, Stephenson Building, Orange, Texas, 77630, attorney for plaintiff.



JAMES W. MEHAFFY, SR.

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