FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SEP 1 - 1971
JAMES R. COONEY, CLERK
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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

SAMUEL R. POTTER :

VS. : CIVIL ACTION NO. 6329

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL :

ANSWERS TO WRITTEN INTERROGATORIES PROPOUNDED TO SAMUEL R. POTTER BY STANDARD ASBESTOS MANUFACTURING & INSULATING COMPANY

SAMUEL R. POTTER, being first duly sworn on his oath, makes the following answers to written interrogatories propounded to him by defendant, Standard Asbestos Manufacturing & Insulating Company:

1.

Yes.

2.

I know that I used Standard Asbestos products at Consolidated shipyard during World War II. I worked there about 22 or 23 months, and used the air cell pipe covering manufactured by Standard Asbestos. I also recall specifically using the Simco #55 hi-temp cement, and also the Simco #9 one-cote cement.

3.

During World War II when I worked at the shipyard here in Orange, my employer was Asbestos Magnesia Material Company. I cannot recall my employers when I used the Standard Asbestos cements, but I know that we used the cements on the DuPont job in Orange and the Spencer job in Orange, and the Jefferson Chemical Company plant job near Port Neches. I also

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believe that on the Fuller-Austin jobs that the cements were used on the Olin-Mathison job at Westlake, Louisiana.

4.

Air cell pipe covering was used in the shipyard during World War II, and the two cements I mentioned in No. 3 were used on the jobs I also mentioned in that answer.

5.

I remember the air cell pipe covering because this was the first time I had used this product and I read the name of the manufacturer, Standard Asbestos, on the box. The reason I recall using the two cements made by Standard Asbestos is because I am looking at samples of these two cements and they have refreshed my memory.

6.

During World War II in Consolidated shipyards in Orange working on destroyers and DE's, and also landing craft. The other occasions when I used the cements was on the DuPont job and Spencer job in Orange, the Jefferson Chemical plant job near Pt. Neches, and the Olin-Mathison job at Westlake, Louisiana. I am sure there are other occasions when I used these products, but at the moment I cannot remember.

7.

I recall using Kaylo and Johns-Manville products and also foamglass on this particular job.

8.

I also recall that foamglass was used on this particular job.

The Potter v. Fibreboard Case File (1969-1972), Answer to Standard Asbestos interrogatories
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9.

I worked for Fluor Corporation on several occasions. I recall working for them on one of the chemical plants here on Chemical Row in Orange, but I don't recall the date.

10.

During World War II I had a slight case of pneumonia, but I wasnot hospitalized. I had not noticed any trouble with my lungs at the various times I used the cements manufactured by Standard.

Samuel R. Potter
SAMUEL R. POTTER

SWORN TO AND SUBSCRIBED BEFORE ME BY THE SAID SAMUEL R. POTTER on this the 31st day of August, 1971.

Jackie Dean
NOTARY PUBLIC, ORANGE COUNTY, TEXAS

CERTIFICATE OF SERVICE BY MAIL

I hereby certify that a true and correct copy of the foregoing instrument was on this the 31st day of August, 1971, mailed to Mr. James W. Mehaffy, San Jacinto Building, Beaumont, Texas 77701, Attorney for Defendant Standard Asbestos Manufacturing & Insulating Company.

ORIGINAL SIGNED BY
WARD STEPHENSON
Ward Stephenson
WARD STEPHENSON

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