IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

SAMUEL R. POTTER :

VS. : CIVIL NO. 6329

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL :

WRITTEN INTERROGATORIES TO DEFENDANTS

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
NOV 17 1971
JAMES R. COONEY, CLERK
BY DEPUTY

TO: FIBREBOARD PAPER PRODUCTS CORPORATION
COMBUSTION ENGINEERING, INC.
JOHNS-MANVILLE PRODUCTS CORPORATION
OWENS-CORNING FIBER GLASS CORPORATION
EAGLE-PICHER INDUSTRIES, INC.
PITTSBURGH CORNING CORPORATION
UNARCO INDUSTRIES, INC.
PHILIP CAREY CORPORATION
RUBEROID COMPANY
ARMSTRONG CORK COMPANY,

Defendants:

Plaintiff hereby serves upon the above named defendants 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 attorneys within thirty (30) days after service herein, in accordance with Rule 33 of the Federal Rules of Civil Procedure:

1.

Fibreboard Paper Products Corporation, one of the defendants in this case, has stated that it has devised a high temperature heat insulation which does not contain asbestos. Has your company devised a high temperature heat insulation which does not contain asbestos?

2.

If your company has not devised a high temperature heat insulation whach does not contain asbestos, please state whether or not you know if any other company has done so, and if so, state the full name of such company.

3.

If you have devised a high temperature heat insulation which does not contain asbestos, please state the name of such product.

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4.

If you have devised a high temperature heat insulation which does not contain asbestos, please state how long you have been manufacturing this insulation.

5.

If you have devised a high temperature heat insulation which does not contain asbestos, please state the exact content of such insulation.

STEPHENSON AND THOMPSON

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

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CERTIFICATE OF SERVICE BY MAIL

I, Ward Stephenson, hereby certify that a true and correct copy of the foregoing instrument, was on this the 16 day of Nov, 1971, mailed to the following named attorneys:

Mr. George E. Duncan
Attorney at Law
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