IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

SAMUEL R. POTTER	§	
	§	
V.	§	CIVIL ACTION NO. 6329
	§	
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL	§	
	§	
	§	

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
NOV 23 1971
JAMES R. COONEY, CLERK
BY DEPUTY

ANSWERS TO INTERROGATORIES OF THE DEFENDANT PHILIP CAREY CORPORATION

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

COMES NOW Philip Carey Corporation, defendant in the above entitled and numbered cause, through its attorneys of record, and makes the following answers to written interrogatories heretofore served on it by counsel for the plaintiff.

INTERROGATORY NO. 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?

ANSWER TO INTERROGATORY NO. 1

1. Yes.

INTERROGATORY NO. 2

If your company has not devised a high temperature heat insulation which 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.

ANSWER TO INTERROGATORY NO. 2

No answer required.

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INTERROGATORY NO. 3

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

ANSWER TO INTERROGATORY NO. 3

Careytemp 1500.

INTERROGATORY NO. 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.

ANSWER TO INTERROGATORY NO. 4

Since October 19, 1969.

INTERROGATORY NO. 5

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

ANSWER TO INTERROGATORY NO. 5

Expanded Perlite	77.0%
Bentonite Clay	10.0%
Starch (Acetylated)	6.0%
Phenolic Resin	2.5%
Silicone (Methyltrimethoxysilane)	0.5%
Glass Fiber (Borosilicate Glass)	4.0%

DATED this 22nd day of November, 1971.

FULBRIGHT, CROOKER & JAWORSKI

By _____
W. N. Arnold, Jr.

Bank of the Southwest Building
Houston, Texas 77002 224-7070

Attorneys for Defendant Philip Carey Corporation

THE STATE OF TEXAS §
§
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared W. N. ARNOLD, JR., known to me to be the attorney of record for the Defendant mentioned above and to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes and consideration therein expressed and that the same is true and correct.

_____
W. N. Arnold, Jr.

The Potter v. Fibreboard Case File (1969-1972), Answers to plaintiff's interrogatories
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GIVEN UNDER MY HAND AND SEAL of office this the 22nd day of November, 1971.

Barbara J. Hull
NOTARY PUBLIC IN AND FOR
HARRIS COUNTY, T E X A S

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was served on the following attorneys by mailing a true and correct copy thereof to their respective offices on this 22nd day of November, 1971.

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Stephenson Building
Orange, Texas

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	§	

ANSWERS TO INTERROGATORIES OF
THE DEFENDANT PHILIP CAREY
CORPORATION

FULBRIGHT, CROOKER & JAWORSKI
ATTORNEYS AT LAW
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