IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 7 - 1971
JAMES R. COONEY, CLERK
BY DEPUTY Margaret Driver

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

ANSWERS OF DEFENDANT ARMSTRONG CORK COMPANY TO FURTHER INTERROGATORIES SERVED NOVEMBER 17, 1971

ARMSTRONG CORK COMPANY, one of the defendants in the above entitled and numbered cause, through its attorney of record, makes the following answers to the written interrogatories served on its attorneys on November 17, 1971, 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

This defendant has done some experimental work in the hope of developing such an insulation product, but has not produced one which is commercially acceptable.

INTERROGARORY 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

Employees of this defendant have some recollections of claims for high temperature heat insulation products not containing asbestos, partially or fully developed by Philip Carey and by DuPont. Whether either of these products was

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commercially produced, as opposed to experimental development, is not recalled.

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

This defendant has not devised such a product.

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

See answer to Interrogatory No. 3

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

See answer to Interrogatory No. 3.

DATED this the 6 day of December, 1971.

ARMSTRONG CORK COMPANY

By _____
W. N. Arnold, Jr.

Attorney of Record for Armstrong Cork Company

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 instument, 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.

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GIVEN UNDER MY HAND AND SEAL of office this the 6th day of December, 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 6th day of December, 1971.

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FULBRIGHT, CROOKER & JAWORSKI
ATTORNEYS AT LAW

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