GED:MB 12/7/71 0-4-f

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 8 - 1971
JAMES R. COONEY, CLERK
BY DEPUTY Margaret Driver

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

SAMUEL R. POTTER :
:
vs. :
: CIVIL ACTION NO. 6329
FIBREBOARD PAPER :
PRODUCTS CORPORATION, :
ET AL :

ANSWERS OF DEFENDANT, PITTSBURGH CORNING CORPORATION TO FURTHER INTERROGATORIES SERVED ON NOVEMBER 17, 1971

PITTSBURGH CORNING CORPORATION, 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 NUMBER 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 NUMBER 1:

No.

INTERROGATORY NUMBER 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 NUMBER 2:

No, other than the answer of Fibreboard Paper Products Corporation, which stated, in answer to an Interrogatory earlier propounded to it, that it has devised a high-temperature heat insulation which does not contain asbestos.

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INTERROGATORY NUMBER 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 NUMBER 3:

Not applicable.

INTERROGATORY NUMBER 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 NUMBER 4:

Not applicable.

INTERROGATORY NUMBER 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 NUMBER 5:

Not applicable.

DATED this 7th day of December, 1971.

PITTSBURGH CORNING CORPORATION

By George E. Duncan

George E. Duncan
WELLS, DUNCAN, BEARD,
GREENBERG AND HUNT
P.O. Box 3708
Beaumont, Texas 77704

Attorneys for Defendant,
PITTSBURGH CORNING CORPORATION

The Potter v. Fibreboard Case File (1969-1972), Answers to plaintiff's further interrogatories
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THE STATE OF TEXAS :

:

COUNTY OF JEFFERSON :

BEFORE ME, the undersigned authority, on this day personally came and appeared GEORGE E. DUNCAN, 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 to the best of his knowledge and belief; that the source of his knowledge and of his beliefs are records, correspondence and other material submitted by the Defendant, PITTSBURGH CORNING CORPORATION.

George E. Duncan

George E. Duncan

SWORN TO and SUBSCRIBED before me, on this the 7th day of December, 1971.

Notary Public in and for Jefferson County, Texas

Certificate of Service

I certify that a copy of the above and foregoing Answers of Defendant, PITTSBURGH CORNING CORPORATION to further Interrogatories served on it on November 17, 1971, has been served on Mr. Ward Stephenson, Stephenson & Thompson, Stephenson Building, Orange, Texas, by placing a copy thereof in the United States Mail, properly addressed, postage prepaid, on this 7th day of December, 1971, and that all other counsel of record have likewise been furnished with a copy of the above and foregoing Answers.

George E. Duncan

George E. Duncan

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CIVIL ACTION NO. 6329

SAMUEL R. POTTER

vs.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

ANSWERS OF DEFENDANT, PITTSBURGH CORNING CORPORATION TO FURTHER INTERROGATORIES SERVED ON NOVEMBER 17, 1971

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