IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 15 1971
JAMES R. COONEY, CLERK
BY DEPUTY Beatrice A. Bryan

SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

CIVIL ACTION NO. 6329

ANSWERS TO INTERROGATORIES OF THE DEFENDANT, JOHNS-MANVILLE PRODUCTS CORPORATION

TO: SAMUEL R. POTTER and/or his attorney of record, Mr. Ward Stephenson, STEPHENSON & THOMPSON, Stephenson Building, Orange, Texas:

COMES NOW, Johns-Manville Products Corporation, one of the Defendants 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; said answers to bear the corresponding number as the Interrogatories:

INTERROGATORY NUMBER 1:

Johns-Manville Products Corporation does not now have on the market a high-temperature heat insulation which does not contain asbestos.

INTERROGATORY NO. 2:

It is our information that Philip Carey Corporation, Fibreboard Paper Products Corporation and Forty-eight Insulations have each developed a high-temperature insulation product which does not contain asbestos.

INTERROGATORY NO. 3:

See answer to Interrogatory No. 1.

INTERROGATORY NO. 4:

See answer to Interrogatory No. 1.

INTERROGATORY NO. 5:

See answer to Interrogatory No. 1.

Gordon R. Pate

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THE STATE OF TEXAS §

COUNTY OF JEFFERSON §

GORDON R. PATE, being duly sworn, upon oath states that he is the attorney of record for the Defendant, Johns-Manville Products Corporation, and authorized in the course of his employment to make and present the foregoing answers to Plaintiff's Interrogatories, which he does under said authority, and being cognizant of the matters therein set forth and based upon the information furnished him and the investigation conducted as to the subject matter of the Interrogatories, says that the said answers are true and correct.

Gordon Pate
GORDON R. PATE

SWORN TO AND SUBSCRIBED before me, the undersigned authority, on this the 14th day of December, 1971.

Joyce L. McClure
NOTARY PUBLIC in and for
Jefferson County, TExas

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing answers to Interrogatories was on the 14th day of December, 1971, forwarded to all counsel of record.

Gordon Pate
GORDON R. PATE

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ANSWER TO INTERROGATORIES

OF THE DEFENDANT, JOHNS-MANVILLE

PRODUCTS CORPORATION

IN THE UNITED STATES DISTRICT

COURT FOR THE EASTERN DISTRICT

OF TEXAS - BEAUMONT DIVISION

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