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 Margaret Brewer

SAMUEL R. POTTER)

V.) CIVIL ACTION NO. 6329

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL)

ANSWERS TO PLAINTIFF'S INTERROGATORIES OF THE DEFENDANT UNARCO INDUSTRIES, INC.

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

COMES NOW UNARCO INDUSTRIES, INC., 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.

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

No. Unarco Industries, Inc., is no longer in the business of insulation manufacturing or marketing.

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.

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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

See answer to Interrogatory No. 1.

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. 1.

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. 1.

DATED this 14th day of December, 1971.

VINSON, ELKINS, SEARLS & SMITH

By Gerald P. Coley

Gerald P. Coley
First City National Bank Building
Houston, Texas 77002 225 - 2411

ATTORNEYS FOR UNARCO INDUSTRIES, INC.

THE STATE OF TEXAS)

COUNTY OF HARRIS)

BEFORE ME, the undersigned authority, on this day personally appeared GERALD P. COLEY, attorney of record for the Defendant, Unarco Industries, Inc., in the above-styled and numbered action, duly authorized to make this affidavit, and having been duly sworn upon his oath, states that the answers and statements contained in the foregoing Answers to Interrogatories are true and correct.

Gerald P. Coley

Gerald P. Coley

SWORN TO AND SUBSCRIBED BEFORE ME by the said GERALD P. COLEY on this the 14th day of December, 1971.

Virginia Cude

Notary Public in and for
Harris County, Texas

The Potter v. Fibreboard Case File (1969-1972), Answers to interrogatories
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CERTIFICATE OF SERVICE

I, GERALD P. COLEY, attorney of record for the Defendant Unarco Industries, Inc., in the above-styled and numbered cause, do hereby certify that a true and correct copy of the above and foregoing Answers to Interrogatories was on this the 14th day of December, 1971, served upon the Plaintiff by depositing the same in the United States Mail, postage prepaid, addressed to Mr. Ward Stephenson, Stephenson & Thompson, Stephenson Building, Orange, Texas, attorney of record for the Plaintiff; and, also, true copies of said Answers to Interrogatories were on this the 14th day of December, 1971, served upon all other Defendants in this action by mailing copies of the same to their said attorneys at their respective addresses.

Gerald P. Coley
Attorney for Defendant Unarco
Industries, Inc.

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SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

ANSWERS TO PLAINTIFF'S INTERROGATORIES OF THE DEFENDANT UNARCO INDUSTRIES, INC.

GERALD P. COLEY
VINSON, ELKINS, SEARLS & SMITH
ATTORNEYS AT LAW
FIRST CITY NATIONAL BANK BUILDING
HOUSTON, TEXAS 77002