IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 30 1971
JAMES R. COONEY, CLERK
BY DEPUTY Imogene L. Jones

SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL

CIVIL ACTION NO. 6329

ANSWERS OF DEFENDANT, COMBUSTION ENGINEERING, INC., TO PLAINTIFF'S INTERROGATORIES

TO:

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

Comes now Combustion Engineering, Inc., ond of the defendants in the above-entitled and numbered cause, through its undersigned attorney of record, and makes the following answers to interrogatories heretofore served upon said defendant under Rule 33 of the Federal Rules of Civil Procedure:

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:

Combustion Engineering, Inc., manufactures an insulating cement that does not contain asbestos for use in the 1500-1600 degree fahrenheit range. It also makes a block which, commencing on November 30, 1971, does not contain asbestos, for use in the 1500-1600 degree fahrenheit range.

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.

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ANSWER TO INTERROGATORY NO. 2:

Not applicable.

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:

The name of the insulating cement is "Castabloc", and the name of the block is "Griptex Block".

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:

The Griptex Block has been manufactured without asbestos since November 30, 1971. Castabloc has been manufactured for sale since early 1966.

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:

Griptex Block	Spun wool	73.53%
	Granulor bentonite	13.24%
	Dexecor	11.03%
	Asbestos	2.20% (Since November 30, 1971 Griptex Block does not contain asbestos).
Castabloc	Granulated wool	33.5%
	Raw earth	10.2%
	Vermiculite	17.9%
	Portland cement	38.4%

Charles L. Griffin

Attorney for Defendant,
COMBUSTION ENGINEERING, INC.,
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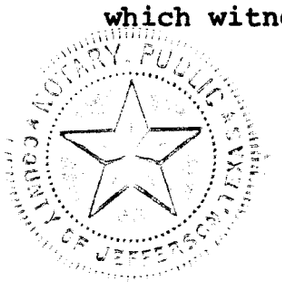
THE STATE OF TEXAS §

COUNTY OF JEFFERSON §

Charles S. Pipkin, having been first duly sworn, on oath deposes and says that he is attorney of record for the defendant, Combustion Engineering, Inc., in the above cause, and as such is duly authorized to make the foregoing answers and this affidavit, and that he does so acting under such authority and authorization; that he has read over the foregoing answers and the same are true and correct.

Charles S. Pipkin

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 30 day of December 1971, to certify which witness my hand and seal of office.



Lillian S. Butcher

NOTARY PUBLIC IN AND FOR
JEFFERSON COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing answers to interrogatories was on this date served upon the plaintiff and his attorneys of record by mailing the same in a correctly addressed, stamped and sealed envelope to his attorney of record, Ward Stephenson, Stephenson & Thompson, Stephenson Building, Orange, Texas; and also, true copies have been served upon all other defendants in this action by mailing the same to their respective attorneys of record at their respective postoffice addresses, this 30th day of December, 1971.

Charles S. Pipkin

ATTORNEY FOR DEFENDANT,
COMBUSTION ENGINEERING, INC.

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