IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

SAMUEL R. POTTER	I	
VS.	I	CIVIL NO. 6329
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL	I	

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
FEB 14 1972
JAMES R. COONEY, CLERK
BY DEPUTY Joy F. McBride

ANSWERS TO DIRECT QUESTIONS

MANAGER OF PATIENTS' ACCOUNTS

ROBERT A. GRAY

(ORIGINAL)

Taxable costs: $ ~~—~~
Paid by Plaintiff

DAHL AND REED
COURT REPORTERS
HOUSTON FIRST SAVINGS BLDG.
HOUSTON, TEXAS

SUBPOENA DUCES TECUM

STATE OF TEXAS
COUNTY OF
TO THE SHERIFF OR ANY CONSTABLE OF Harris, COUNTY, GREETING:

You are hereby required and commanded at the instance of the Plaintiff to summon Administrator of Methodist Hospital who resides in your county, to be and appear before the undersigned or other notary public in and for Harris County, Texas, on the 25th day of January, at 1:30 PM, in the office of ~~xxxxxxxxxxxxxxxxxxxxxxxx~~ Methodist Hospital Administrator then and there to answer ~~xxx~~ (written) questions propounded to him (~~xxx~~) in a suit styled Samuel R. Potter vs. Fibreboard Paper Products Corporation, ET AL being numbered CA NO. 6329 on the docket of the United States District Court District Court of County, Texas, and to bring with him (~~her~~) the following:

FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

Copies of the hospital statements for each confinement of Samuel R. Potter in the Methodist Hospital

And that he (~~she~~) continue his (~~her~~) attendance from day to day until discharged by me, all in accordance with a Notice issued on the 16th day of November, 1971.

HEREIN FAIL NOT, but have you then and there this Writ before me showing how you have executed the same.

GIVEN UNDER my hand and seal of office, and issued this 25th day of ~~January~~, A.D., 1972.

Bill Eaton Bill Eaton
Notary Public in and for
Harris County, Texas

SHERIFF'S OR CONSTABLE'S RETURN

Came to hand the ____ day of ____, 19__, executed the ____ day of ____, 19__, by serving a true copy of the within Writ, in ____ County, Texas, and rendering ____ ($1.00) One dollar ____ accepted.

Fees:

SHERIFF OR CONSTABLE

County, Texas

By:

Deputy

KEMPER W. STEPHENSON, 1958
WARD STEPHENSON
MARLIN THOMPSON

Law offices of **STEPHENSON AND THOMPSON**

STEPHENSON BUILDING / 712 DIVISION STREET
ORANGE, TEXAS 77630 / 883-9396

November 16, 1971

Dahl and Reed
Court Reporters
Houston First Savings Building
Houston, Texas 77002

Re: Civil No. 6329, Samuel R. Potter vs. Fibreboard Paper Products Corporation, et al

Gentlemen:

We are enclosing notice to take the written interrogatories of the Administrator of The Methodist Hospital in your city. After the expiration of thirty days, please make an appointment with the Administrator to obtain his answers to our direct interrogatories, and any cross-interrogatories which may have been received by you from the defendants' attorneys.

We will need one copy of the answers.

Yours truly,

STEPHENSON & THOMPSON

Ward Stephenson

WS:jb
Encl.

IN THE UNITED STATES DISTRICT COURT

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SAMUEL R. POTTER	:	
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FIBREBOARD PAPER PRODUCTS CORPORATION ET AL	:	

TO: ALL DEFENDANTS AND INTERVENOR IN THE ABOVE STYLED AND NUMBERED CAUSE:

Gentlemen: Please take notice that the deposition of the Administrator of the Methodist Hospital, Houston, Texas, will be taken on behalf of the plaintiff upon certain written interrogatories, of which a copy is herewith served upon you, and such cross-interrogatories as may be served upon plaintiff herein, before Dahl & Reed, Court Reporters, Houston First Savings Building, Houston, Texas 77002.

STEPHENSON AND THOMPSON

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

IN THE UNITED STATES DISTRICT COURT

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DIRECT INTERROGATORIES TO BE PROPOUNDED BY PLAINTIFF TO ADMINISTRATOR OF THE METHODIST HOSPITAL, HOUSTON, TEXAS

1.

Please state your full name and address to the court reporter.

2.

Are you the Administrator of The Methodist Hospital, Houston, Texas?

3.

Please state how long you have served in this capacity.

4.

Please state what your duties entail as Administrator of The Methodist Hospital.

5.

Please state whether or not Samuel R. Potter, of Orange, Texas, was ever a patient in The Methodist Hospital.

6.

Please state the dates of each confinement in The Methodist Hospital of Samuel R. Potter.

7.

Please attach copies of your hospital statements for each confinement of Samuel R. Potter in The Methodist Hospital.

8.

Were the charges set forth in each statement reasonable and customary charges for the medical and hospital services rendered to Mr. Potter?

STEPHENSON AND THOMPSON

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

CERTIFICATE OF SERVICE BY MAIL

I, Ward Stephenson, hereby certify that a true and correct copy of the foregoing instrument, was on this the 16 day of Nov., 1971, mailed to the following named attorneys:

Mr. George E. Duncan
Attorney at Law
P. O. Box 3708
Beaumont, Texas 77704
Attorney for Defendant
PITTSBURGH CORNING CORP.

Mr. W. N. Arnold, Jr.
Attorney at Law
Fulbright, Crooker, Freeman,
Bates & Jaworski
Bank of the Southwest Bldg.
Houston, Texas 77002
Attorney for Defendants
ARMSTRONG CORK COMPANY
and PHILIP CAREY CORP.

Mr. Robert E. Barnes
Attorney at Law
P. O. Box 5098
Beaumont, Texas 77706
Attorney for Defendant
RUBEROID COMPANY, DIVISION
OF GAF CORPORATION

Mr. Charles S. Pipkin
Attorney at Law
P. O. Box 1632
Beaumont, Texas 77704
Attorney for Defendant
COMBUSTION ENGINEERING, INC.

Mr. Dale Dowell
Attorney at Law
707 Beaumont Savings Bldg.
Beaumont, Texas 77701
Attorney for Defendant
OWENS-CORNING FIBERGLAS
CORPORATION

Mr. George A. Weller
Attorney at Law
P. O. Box 350
Beaumont, Texas 77704

Mr. John H. Benckenstein
Attorney at Law
Petroleum Building
Beaumont, Texas 77701
Attorneys for Defendant
FIBREBOARD PAPER PRODUCTS
CORPORATION

Mr. Gerald P. Coley
Attorney at Law
Vinson, Elkins, Searls & Smith
First City National Bank Bldg.
Houston, Texas 77002
Attorney for Defendant
UNARCO INDUSTRIES, INC.

Mr. James W. Mehaffy
Attorney at Law
San Jacinto Building
Beaumont, Texas 77701
Attorney for Defendant
STANDARD ASBESTOS MANUFACTURING
AND INSULATING COMPANY

Mr. Ben L. Reynolds
Attorney at Law
Royston, Rayzor and Cook
One Shell Plaza
Houston, Texas 77002
Attorney for Defendant
EAGLE-PICHER INDUSTRIES, INC.

Mr. Gordon R. Pate
Attorney at Law
1119 Beaumont Savings Bldg.
Beaumont, Texas 77701

Mr. John Tucker
Attorney at Law
Beaumont Savings Building
Beaumont, Texas 77701
Attorneys for Defendant
JOHNS-MANVILLE PRODUCTS
CORPORATION

Mr. George E. Murphy
Attorney at Law
615 San Jacinto Building
Beaumont, Texas 77701
Attorney for Intervenor

Ward Stephenson

WARD STEPHENSON

IN THE UNITED STATES DISTRICT COURT

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ANSWERS AND DEPOSITION OF ROBERT A. GRAY, taken on behalf of the Plaintiff, to the accompanying direct questions propounded to him in connection with the above styled and numbered cause, taken on the 25th day of January, 1972, at Methodist Hospital, Houston, Texas, pursuant to the notice attached hereto.

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ROBERT A. GRAY,

being duly cautioned and sworn to testify the truth, the whole truth, and nothing but the truth in answer to the direct questions as hereinafter indicated deposes and says as follows:

DIRECT QUESTIONS

QUESTION NO. 1:

Pleast state your full name and address to the court reporter.

ANSWER:

Robert A. Gray, Methodist Hospital, Houston, Texas.

QUESTION NO. 2:

Are you the Administrator of The Methodist Hospital, Houston, Texas?

ANSWER:

No. I am Patients' Account Manager.

QUESTION NO. 3:

Please state how long you have served in this capacity.

ANSWER:

Seven years.

QUESTION NO. 4:

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Please state what your duties entail as Administrator of The Methodist Hospital.

ANSWER:

As Patients' Account Manager, I am in charge of patients' accounts.

QUESTION NO. 5:

Please state whether or not Samuel R. Potter, of Orange, Texas, was ever a patient in The Methodist Hospital.

ANSWER:

Yes.

QUESTION NO. 6:

Please state the dates of each confinement in The Methodist Hospital of Samuel R. Potter.

ANSWER:

6-3-70 to 6-6-70

9-27-70 to 10-2-70

6-14-71 to 7-12-71

QUESTION NO. 7:

Please attach copies of your hospital statements for each confinement of Samuel R. Potter in The Methodist Hospital.

ANSWER:

(Complying)

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QUESTION NO. 8:

Were the charges set forth in each statement reasonable and customary charges for the medical and hospital services rendered to Mr. Potter?

ANSWER:

Yes.

Robert A. Gray

Robert A. Gray

THE STATE OF TEXAS:

COUNTY OF HARRIS:

SUBSCRIBED and SWORN to before me on this the 27th day of January, 1972.

Bill Eaton

Bill Eaton
Notary Public, Harris County, Texas

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THE STATE OF TEXAS:

COUNTY OF HARRIS:

I, the undersigned, a notary public in and for Harris County, Texas, do hereby certify that the facts as stated in the caption hereto are true; that the foregoing answers of the witness, Robert A. Gray, were by said witness made before me, and were subscribed by him before me on this the 27th day of January, 1972.

Bill Eaton

Bill Eaton
Notary Public, Harris County, Texas

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