A-13,916

| | | |
|---|---|---|
| CLAUDE J. TOMPLAIT | : | IN THE DISTRICT COURT OF |
| VS | : | ORANGE COUNTY, T E X A S |
| THE TRAVELERS INSURANCE COMPANY, ET AL | : | 128TH JUDICIAL DISTRICT |

ANSWERS AND DEPOSITION OF DOYLE GLEN ADAIR, taken on behalf of the Plaintiff, to the accompanying direct interrogatories propounded to him in the above styled and numbered cause, taken before ANN SMITH, a Notary Public in and for Harris County, Texas, on the 26th day of March, A. D., 1964, at Houston, Texas, pursuant to the commission hereto attached.

HARRIS-LEED
OFFICIAL REPORTERS
HOUSTON, TEXAS

EXHIBIT "A"


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DOYLE GLEN ADAIR,

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

DIRECT INTERROGATORIES

QUESTION NO. 1:

Please state your full name and address.

ANSWER:

Doyle Glen Adair, P. O. Box 2683, Houston, Texas, 77001.

QUESTION NO. 2:

By whom are you employed and in what capacity?

ANSWER:

The Aber Company, Inc. - Treasurer.

QUESTION NO. 3:

Please state the date that Claude J. Tomplait was employed by your company.

ANSWER:

9-5-61 to 1-24-62, 3-14-62 to 5-2-62, 11-30-62 to 1-18-63.

QUESTION NO. 4:

Please state the date that the employment of Claude J. Tomplait with your company ended.

DARL K. REED
OFFICIAL REPORTERS
HOUSTON, TEXAS


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ANSWER:

9-5-61 to 1-24-62, 3-14-62 to 5-2-62, 11-30-62 to 1-18-63.

QUESTION NO. 5:

Please state the exact location where Mr. Tomplait worked for your company. For example, the Bridge City power house of Gulf States Utilities Company.

ANSWER:

First and third interval - Gulf States Utilities Co., Bridge City, Texas - Second interval - Gulf Oil Corp., Port Arthur, Texas.

QUESTION NO. 6:

Please state whether or not Claude J. Tomplait was employed by you as an insulator.

ANSWER:

Yes, in each case.

QUESTION NO. 7:

If Mr. Tomplait was not employed as an insulator, in that capacity was he employed?

ANSWER:

Not applicable.

QUESTION NO. 8:

Please state exactly what types of insulation was used by Mr. Tomplait in his work for your company, giving the manufacturers' name and address.

DAHL & REED
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HOUSTON, TEXAS


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ANSWER:

We have no records which will show which particular materials were used by Mr. Tomplait in his work for our company. Our records reflect that the following types of insulating material were included in the material cost charged to the contracts involved in Item No. 5 above:

| Trade name | Description | Manufacturer |
|---|---|---|
| Kaytherm | calcium silicate | Keasbey & Mattison Co., Ambler, Pa. |
| Aber 2 to 3 | cement | Rockwool Mfg. Co., Leeds, Alabama |
| Sealfas 3149 | mastic | Benjamin Foster Co., Ambler, Pa. |
| Aluminum ells | mastic | Huff Mfg. Co. Shreveport, La. |
| Foamglas | foamed silicate | Pittsburgh Corning Corp. One Gateway Center, Pittsburgh, Pa. |
| Aluminum rolls | foamed silicate | Consolidated Gen. Prod. Co., Houston, Texas. |
| Overkote | asphalt emulsion | American Petrofina Mt. Pleasant, Texas |
| Unibestos | asbestos fiber | Pittsburgh Corning Corp. |
| Climaseal | mastic | American Petrofina |
| Steel bands | mastic | Techalloy, Inc. Houston, Texas |

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Aluminum seals mastic — Stern Supply Co. Houston, Texas.

QUESTION NO. 9:

Please give the full description of what this insulation consisted of, such as fiberglas, rock wool, foam glass, thermasbestos, etc.

ANSWER:

See answer to No. 8.

Doyle G. Adair

THE STATE OF TEXAS:

COUNTY OF HARRIS:

SUBSCRIBED AND SWORN TO BEFORE ME on this the 24th day of March, 1964.

Ann Smith, Notary Public in and for Harris County, Texas



*The Tomplait v. Combustion Engineering Case File (1962-1969), Interrogatories to the Aber Company*
ACL Doc 10885 · Page 5 of 6
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THE STATE OF TEXAS:

COUNTY OF HARRIS:

I, ANN SMITH, an Official Court Reporter and 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, DOYLE G. ADAIR, were by said witness made before me, and were sworn to and subscribed by him before me.

Ann Smith

Ann Smith, Notary Public in and for Harris County, Texas




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