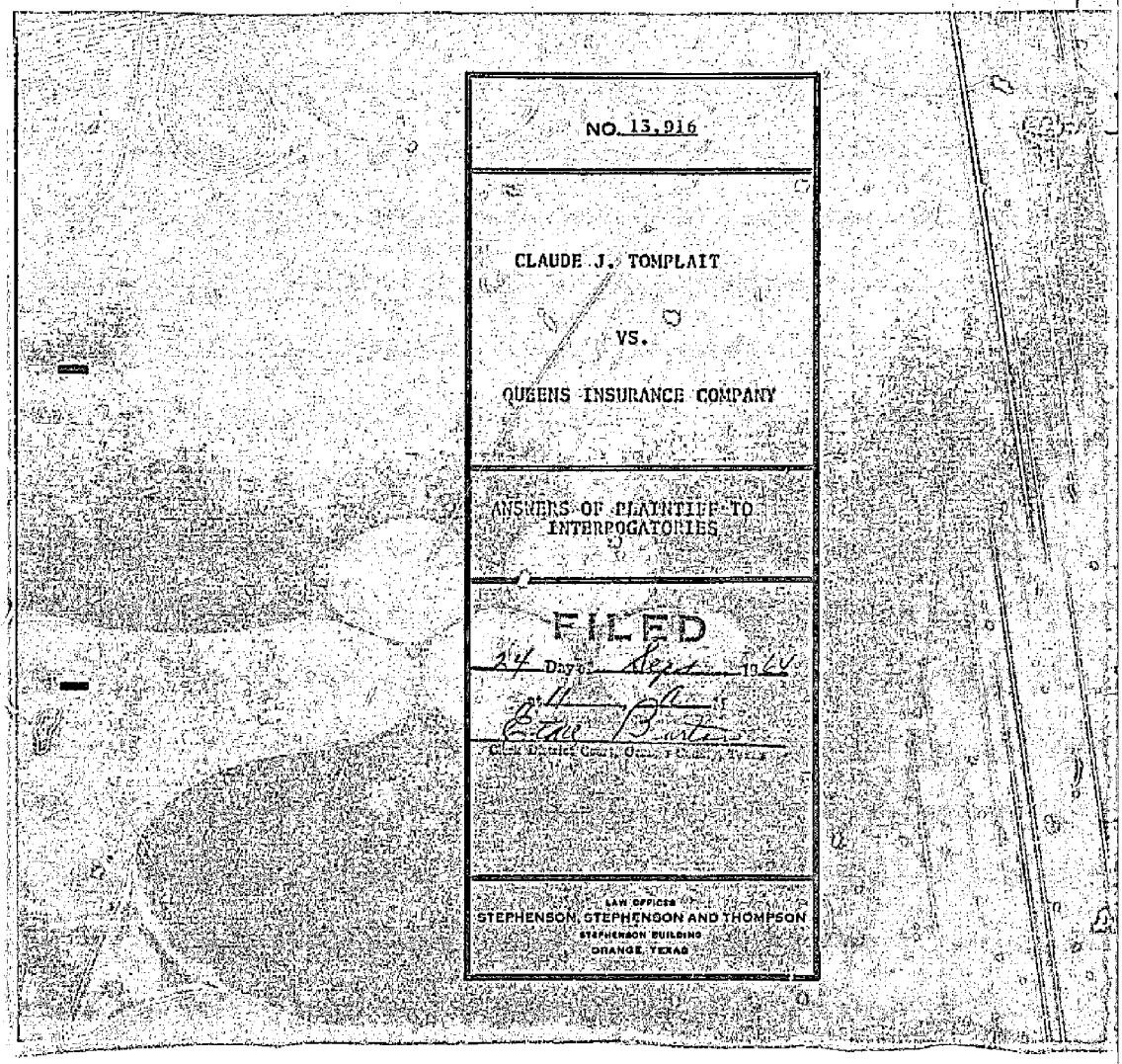


NO. 13,916

CLAUDE J. TOMPLAIT

VS.

QUEENS INSURANCE COMPANY

ANSWERS OF PLAINTIFF TO INTERPOGATORIES

FILED

24 Day of Sept 1964

Etta Bentz

Clerk District Court, Orange County, Texas

LAW OFFICES
STEPHENSON, STEPHENSON AND THOMPSON
STEPHENSON BUILDING
ORANGE, TEXAS

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NO. 13,916

IN THE 128TH DISTRICT COURT OF ORANGE COUNTY, TEXAS

CLAUDE J. TOMPLAIT :

VS. : ANSWERS OF PLAINTIFF TO INTERROGATORIES

QUEENS INSURANCE COMPANY:

TO: QUEEN INSUPANCE COMPANY OF AMERICA, and Its Attorneys of Record, Orgain, Bell and Tucker First Federal Savings Building, Beaumont, Texas:

COMES NOW CLAUDE J. TOMPLAIT, plaintiff in this cause, and under oath herewith makes his answers to the Interrogatories propounded to him by the defendant Queen Insurance Company of America:

INTERROGATORY NO. 1 — Claude J. Tomplait, Sr.

INTERROGATORY NO. 2 — I can tell you who I worked for in 1963 and 1964, and the amounts I made; but I cannot give you the dates I worked for my employers in 1963. The following is a list of my employers in 1963 as shown by copies of my W-2 forms: B & B Engineering and Supply Company; Julien Angelle (Triangle Insulation Company); The Industrial Insulators, Inc.; Johns-Manville Sales Corporation; The Aber Company, Inc.; Sabine Insulation Company, Inc.; Insulation Engineers, Inc.

The following is a list of my employers in 1964 as shown by my check stubs: Triangle Insulation Company; B and B Engineering & Supply Co., Inc.; Sabine Insulation C o., Inc.; Johns-Manville; and The Industrial Insulators, Inc.

INTERROGATORY NO. 3 — B & B ENGINEERING AND SUPPLY COMPANY:
(a) I do not recall.
(b) I do not recall.
(c) As I recall, eight hours a day.
(d) As I recall, five days a week.
(e) DuPont in Orange, Texas. This was about February, 1963.
(f) We were fire-proofing.

(g) DuPont, in Orange, Texas.
(h) I don't remember the area number.
(i) Mostly nippers and trowles.
(j) No protective clothing but safety belts, and goggles.
(k) I do not recall. I believe I did use some.
(l) I believe it was Carytemp.
(m) Applied pipe covering to the pipe.
(n) Noble Wise.
(o) Otis Boudreaux; George Petry; Walter Smith; Preston Pelterie; Leon Smith. These are all I recall.
(p) About $4.00 an hour.
(q) My income tax W-2 form shows $458.00.
(r) Fire-proofing, and insulating.

INTERRO

JULIEN ANGELLE (TRIANGLE INSULATION COMPANY):
(a) Around the 1st of Nov., 1963.
(b) About Jan. 9, 1964.
(c) Eight hours.
(d) Five days.
(e) Houston Chemical, Beaumont.
(f) Insulating.
(g) Houston Chemical Plant, Beaumont.
(h) I do not recall the area.
(i) Saws, nippers, trowles, roofing knife; butcher knife.
(j) None.
(k) Yes, all kinds.
(l) I don't recall the brand name but it was 85% magnesium.
(m) I was applying pipe covering.
(n) Harold Lee Broussard.
(o) Percy LaGrappe; Lee Trahan; Joe Dupuis; Preston Pelterie; and that's all I recall.
(p) It was about $4.12 per hour.
(q) $759.04 as shown by my W-2 form.
(r) Insulating pipe.

THE INDUSTRIAL INSULATION, INC.
(a) I don't recall.
(b) I don't recall.
(c) Eight hours.
(d) Five days.
(e) Jefferson Chemical, Port Neches.
(f) Insulating and applying sheet metal.
(g) Jefferson Chemical, Port Neches.
(h) I don't recall.
(i) Trowles, nippers, knife, saw, tin snips, punch, screw driver, dividers.
(j) None.
(K) Yes.
(l) Asbestos insulating material, fiberglas, and Magnesia; I don't recall the brand names.

(m) Applying insulation material and sheet metal.
(n) Cecil Gladon.
(o) Walter Thibodeaux; Clarence Thibodeaux; Johnny Crochet; Lee Trahan; Preston Pelterie; and that is all I recall.
(p) About $4.12 per hour.
(q) $957.99.
(r) Insulating pipe and exchanges.

JOHNS-MANVILLE SALES CORPORATION:
(a) I don't recall.
(b) I don't recall.
(c) I don't recall.
(d) I don't recall.
(e) I don't recall.
(f) I don't recall.
(g) I don't recall.
(h) I don't recall.
(i) I don't recall.
(j) None; they never do have.
(k) I must have.
(l) I don't recall.
(m) I must have applied it.
(n) I don't recall.
(o) I don't recall.
(p) I don't recall.
(q) My W-2 Form shows $396.00.
(r) I don't recall.

THE ABER COMPANY, INC.
(a) I don't recall.
(b) I don't recall.
(c) I don't recall.
(d) I don't recall.
(e) I don't recall.
(f) I don't recall.
(g) I don't recall.
(h) I don't recall.
(i) I don't recall.
(j) They never had any.
(k) Well, I probably did.
(l) I don't recall the brand name.
(m) I don't recall.
(n) I don't recall.
(o) I don't recall.
(p) I don't recall.
(q) My W-2 form shows $408.00.
(r) I don't recall. I don't remember whether this was the Bridge City Power House job or the Gulf job, and therefore I cannot answer all these questions.

SABIN INSULATION, INC.
(a) I believe it was the first part of 1965.
(b) About June or July, 1963.

(c) Eight.
(d) Five.
(e) Firestone job, Orange, Texas.
(f) Applying pipe covering.
(g) Firestone, Orange, Texas.
(h) All over the plant.
(i) The same as I used on the other jobs listed above.
(j) None.
(k) Yes.
(l) I don't know the brand names; but I believe it was magnesia and fiberglas.
(m) Applying insulation on pipes.
(n) Andrew Guidry.
(o) R. L. Faulk; H. L. LeBlanc; Walter Smith; Leon Smith; Marvin Potter.
(p) About $4.00 an hour.
(q) My W-2 form shows $1,479.10.
(r) Insulating pipes.

INSULATION ENGINEERS, INC.
(a) About first of July, 1963.
(b) About the end of August, 1963.
(c) Ten hours.
(d) Six and seven.
(e) A refinery in Pascagoula, Miss.
(f) Insulating.
(g) A refinery in Pascagoula, Miss.
(h) I don't recall.
(i) Mostly the same kinds of tools used on the jobs listed above.
(j) None.
(k) Yes.
(l) Foamglas and magnesia.
(m) Applied to pipe.
(n) I don't remember his name.
(o) Joe Gonzales; Walter Smith; Al Gonzales.
(p) I don't remember.
(q) My W-2 form shows $1,918.20.
(r) Insulating pipes and towers.

TRIANGLE INSULATION COMPANY:
(a) Around the 1st of Nov. 1963.
(b) About Jan. 9, 1964.
(c) Eight hours.
(d) Five days.
(e) Houston Chemical, Beaumont.
(f) Insulating.
(g) Houston Chemical, Beaumont.
(h) I do not recall the area.
(i) Saws, nippers, trowles, roofing knife; butcher knife.
(j) None.
(k) Yes, all kinds.
(l) I don't recall the brand name but it was 85% magnesium.

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(m) I was applying pipe covering.
(n) Harold Lee Broussard.
(o) Percy LaGrappe; Lee Trahan; Joe Dupuis; Preston Pelterie; and that's all I recall.
(p) It was about $4.12 per hour.
(q) $106.52 and $78.98 as shown by my check stubs.
(r) Insulating pipe.

B AND B ENGINEERING & SUPPLY CO.:
(a) January, 1964.
(b) January 27, 1964.
(c) Ten hours a day.
(d) I believe it was seven.
(e) Big Three Welding, Orange.
(f) Packing cold box with rockwool.
(g) Big Three Welding, Orange.
(h) Where the plant is.
(i) Nippers, trowles, hacksaw and rule.
(j) None.
(k) Yes.
(l) Foamglas.
(m) Packing cold box with rockwool and covering pipe with Foamglas.
(n) Earl Kersler.
(o) Donald Guidry; Carl Bellair; and those are all I remember.
(p) About $4.12 an hour.
(q) $185.62, $309.38 and $165.00 as shown by my check stubs.
(r) Packing cold box and covering pipe.

SABINE INSULATION CO., INC.:
(a) About 1st of February, 1964.
(b) March 1, 25, 1964.
(c) Eight hours.
(d) Five.
(e) Firestone, Orange.
(f) Insulating pipe.
(g) Firestone plant, Orange.
(h) All over the plant.
(i) Generally the same tools listed above.
(j) None.
(k) Yes.
(l) Magnesia.
(m) Applied to pipe and repair work.
(n) Andrew Guidry.
(o) Leslie Faulk; O. J. LeBlanc; Joe LeBlanc; H. L. LeBlanc; Walter Smith, Leon Smith.
(p) $4.12 per hour.
(q) $129.20, $129.20 and $45.18 and $129.20, as shown by my check stubs.

JOHNS-MANVILLE:
(a) About March 2, 1964.
(b) About March 15, 1964.
(c) Eight.
(d) Five.
(e) Firestone Plant, Orange.
(f) Insulating pipe.
(g) Firestone plant, Orange.
(h) Finishing building or area.
(i) Generally the same used on the jobs above listed.
(k) Yes.
(l) Magnesia.
(m) Applied to pipe.
(n) Bruce Bell.
(o) Nolan Gaspar; Birt Coulter; D. P. Green; Roy Bergeron; Raymond Potter and S. R. Potter.
(p) $4.12 an hour.
(q) $117.52 and $69.63 as shown by my check stubs.
(r) Insulating pipe.

SABINE INSULATING CO., INC.
(a) About April, 19, 1964.
(b) About May 10, 1964.
(c) Varied.
(d) It varied.
(e) Levingston Shipbuilding, Orange, Texas.
(f) Insulating pipe.
(g) Levingston Shipbuilding, Orange, Texas.
(h) On an oil rig.
(i) Generally the same as usual.
(j) None.
(k) Yes.
(l) Magnesia,and Fiberglas.
(m) Applied to pipe.
(n) A. J. Pello.
(o) George Petry; and I can't remember any more.
(p) $4.12 per hour.
(q) $49.82, $91.50, $127.04 and $223.93 as shown by my check stubs.
(r) Insulating pipe.

THE INDUSTRIAL INSULATORS, INC.:
(a) About a week prior to June 1, 1964.
(b) June 4, 1964.
(c) Eight.
(d) Five.
(e) Atlantic Refinery, Port Arthur, and Olin Mathieson, Beaumont.
(f) Covering and insulating a tower, and repairing a boiler.
(g) Atlantic Refinery in Port Arthur, and Olin Mathieson Plant, Beaumont.
(h) Boiler area.
(i) Generally the same as usual.
(j) None.

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(k) Yes.
(l) Magnesia.
(m) Applied to boiler and tower.
(n) On the Atlantic job, Cecil Gladdon; and on the Olin Mathieson job, U. N. Landry.
(o) Atlantic: Ily Ardeaux.
Mathieson: Percy LaGrappe; Joe Dupuis.
(p) A little over $4.12 an hour.
(q) $109.00, $14.83 and $68.28 as shown by my check stubs.
(r) Insulating a tower and a boiler.

INTERROGATORY NO. 4: Dr. John C. Greco, Bridge City.
Dr. Tom R. Jones, Houston.
Dr. Thomas Lombardo, Beaumont.
Dr. Leary, Houston.
Dr. Rudeseal, Orange.

INTERROGATORY NO. 5: Memorial Baptist Hospital, Houston.
Orange Memorial Hospital, Orange.

INTERROGATORY NO. 6: Memorial Baptist Hospital, three days in August, 1961.
Orange Memorial Hospital, Orange: May, 1963 for about six or seven days; and then had to return for five more days; February, 1964 for about one week; About September 10, 1964, for one night.

Claude J. Tomplait
CLAUDE J. TOMPLAIT

SWORN TO AND SUBSCRIBED before me by the said Claude J. Tomplait, on this the 21st day of September, 1964.

Jackie Bean
Notary Public, Orange County, Texas.