IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL ACTION NO. 5402

COMBUSTION ENGINEERING, INC., ET AL :

FILED
NOV 3 - 1967
James R. Cooney, Clerk, U.S. Court
By Hazel E. Studdard DEPUTY

INTERROGATORIES PROPOUNDED TO DEFENDANTS

TO: COMBUSTION ENGINEERING, INC.,
R & I REFRACTOR AND INSULATION CORPORATION,
JOHNS-MANVILLE SALES CORPORATION,
JOHNS-MANVILLE PRODUCTS CORPORATION,
JOHNS-MANVILLE FIBER GLASS, INC.,
OWENS-CORING FIBER GLASS CORPORATION,
PITTSBURGH CORNING CORPORATION,
GUSTIN-BACON MANUFACTURING COMPANY,
PITTSBURGH PLATE AND GLASS COMPANY,
FIBREBOARD PAPER PRODUCTS CORPORATION,
EAGLE-PICHER INDUSTRIES, INC.,

Defendants:

CLAUDE J. TOMPLAIT, plaintiff, hereby serves upon the above named defendants the following written interrogatories to be answered fully and fairly in writing under oath, which shall be signed by the person or persons making such answers, a copy of such answers to be served upon plaintiff's attorney within fifteen (15) days after service herein, in accordance with Rule 33 of the Federal Rules of Civil Procedure:

INTERROGATORY NO. 1: Give the names and trade names of all types of insulating materials manufactured by you, giving the dates that you began to manufacture such materials, starting in 1950, a description of the materials and what they contain.

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INTERROGATORY NO. 2: Did you ever at any time give warnings to workers of the dangerous nature of such materials? If so, describe your warnings and to whom such warnings were given.

INTERROGATORY NO. 3: What studies have you made to determine the effect of your products on the lungs and physical condition of persons employed as insulators and asbestos workers who use the materials?

INTERROGATORY NO. 4: Who made such studies, when were they made, and attach copies of the reports of the studies.

INTERROGATORY NO. 5: Did you package and sell any one of the products named in plaintiff's first amended original complaint, and if so, how were the products sold, how were the products packaged, and were these products universally used throughout the United States?

INTERROGATORY NO. 6: If these products were used primarily in any specific location or area, please explain where such products were primarily used.

INTERROGATORY NO. 7: Do you not recognize that prolonged use of the insulating materials manufactured by you can cause or contribute to cause various occupational diseases including asbestosis, silicosis and dermatitis?

INTERROGATORY NO. 8: Did you manufacture or sell any insulating products which were used by any of the named contractors or employers: B & B Engineering and Supply Company, Brooks-Fisher Insulating Company, Fluor Corporation, Ltd., Armstrong Contracting and Supply Corporation, The Aber Company, Inc., Sabine Insulating Company, Inc., Johns-Manville Sales Corporation, Insulation Engineers, Inc., Triangle Insulation Company, Industrial Insulation, Inc., between the years 1950 to date?

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Attorney for Defendants COMBUSTION ENGINEERING, INC. and REFRACTORY & INSULATION CORPORATION

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Attorney for Defendants PITTSBURGH PLATE GLASS COMPANY and PITTSBURGH CORNING CORPORATION

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Attorney for Defendants JOHNS-MANVILLE SALES CORPORATION, JOHNS-MANVILLE PRODUCTS CORPORATION, and JOHNS-MANVILLE FIBER GLASS, INC.

Ward Attorneys

Attorney for Plaintiff

STEPHENSON, THOMPSON AND MORRIS

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas

CERTIFICATE OF SERVICE BY MAIL

A copy of the foregoing Interrogatories has been forwarded to the following attorneys of record on this the 2nd day of November, 1967, by Certified Mail, Return Receipt Requested:

Mr. Ben L. Reynolds
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Houston, Texas 77002

Attorney for Defendant EAGLE-PICHER INDUSTRIES, INC.

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LAW OFFICES
STEPHENSON, THOMPSON & MORRIS
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