IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

FILED
JAN 5 1968
James R. Cooper, Clerk
By Margaret Brown DEPUTY

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC., ET AL

CIVIL ACTION NO. 5402

INTERROGATORIES

TO: CLAUDE J. TOMPLAIT, Plaintiff, and WARD STEPHENSON, of Stephenson, Thompson & Morris, Stephenson Building, Orange, Texas, His Attorney of Record

You are hereby notified to answer under oath the interrogatories hereinafter set forth within fifteen days after the time service is made upon you in accordance with Rule 33 of the Federal Rules of Civil Procedure.

1.

In paragraphs 15 through 36 of Plaintiff's First Amended Complaint, it is alleged that during the years 1959 through 1964, while working for various employers, plaintiff was required to come in contact with various materials described as Foamglas, magnesium, fireproofing, asbestos, Careytemp, Kaytherm, Aber 2 to 3, Sealfast 3149, aluminum ells, aluminum rolls, Overkote, Unibestos, Climaseal, steel bands, aluminum sills, calcium silicate, mineral wool insulating cement, aluminum jacketing, Thermoglas, Rock wool and fiberglas. It is further alleged in said First Amended Complaint that defendants, of whom there are eleven named, compounded, manufactured and prepared such materials and that said defendants were negligent and careless in regard thereto in various particulars.

With respect to defendant Owens-Corning Fiberglas Corporation, please state:

a. What products or materials described by trade name or other identifiable description does plaintiff claim were compounded, manufactured, prepared or distributed by Owens-Corning Fiberglas Corporation and with which he came in contact?

Published by AsbestosClaims.Law
asbestosclaims.law/library/10734/1

b. On what date or dates does plaintiff claim he came in contact with any such products or materials of this defendant?

c. For what employer or employers was plaintiff working when he came in contact with any such products or materials of this defendant, setting forth the name and address of such employer or employers and the date or dates of employment by each employer.

d. At what place or places was plaintiff working when he came in contact with any such products or materials of this defendant?

e. At each time and place that plaintiff came in contact with any such products or materials of this defendant, what were the symptoms or manifestations of plaintiff that he will claim indicated any harm or injury to his body?

2.

With respect to any materials which you claim Owens-Corning Fiberglas Corporation compounded, manufactured and prepared, please state in what manner said materials were defective.

3.

With respect to any materials which you claim defendant Owens-Corning Fiberglas Corporation compounded, manufactured and prepared, please state in what manner said materials were not suitable for the purpose for which they were intended.

John D. Rienstra

JOHN D. RIENSTRA
Attorney for Defendant,
Owens-Corning Fiberglas Corporation

707 Beaumont Savings Building
Beaumont, Texas 77701

Published by AsbestosClaims.Law
asbestosclaims.law/library/10734/2

The foregoing interrogatories were served by mailing a copy thereof by certified mail, return receipt requested, on this 4th day of January, 1968, to Mr. Ward Stephenson, Stephenson Building, Orange, Texas, attorney for plaintiff.

John D. Rinaldi

Published by AsbestosClaims.Law
asbestosclaims.law/library/10734/3

CIVIL ACTION NO. 5402

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC., ET AL

INTERROGATORIES

KING, SHARFSTEIN & RIENSTRA
ATTORNEYS AT LAW
707 BEAUMONT SAVINGS BUILDING
BEAUMONT, TEXAS 77701