IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED

JAN 15 1968 M. 19 .

James R. Cooney, Clerk, U. S. Court

By Virginia N. Sims DEPUTY

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

COMBUSTION ENGINEERING, INC., ET AL :

NOTICE

TO: Mr. Ben L. Reynolds
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Attorney for Defendants JOHNS-MANVILLE SALES CORPORATION, JOHNS-MANVILLE PRODUCTS CORPORATION, and JOHNS-MANVILLE FIBER GLASS, INC.

Gentlemen: Take notice that the deposition of DR. IRVING J. SELIKOFF, Mt. Sinai Hospital, 11 East 100th Street, in the City of New York, State of New York, will be taken on behalf of the plaintiff upon certain interrogatories, of which a copy is herewith served upon you, and such cross-interrogatories as may be duly served herein, before one of the court reporters of SOUTHERN DISTRICT COURT REPORTERS, United States Court House, Foley Square 7, New York.

STEPHENSON, THOMPSON AND MORRIS

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

CLAUDE J. TOMPLAIT	:	
VS.	:	CIVIL NO. 5402
COMBUSTION ENGINEERING, INC., ET AL	:	

INTERROGATORIES TO BE PROPOUNDED
TO DR. IRVING J. SELIKOFF

Interrogatories to be propounded to Dr. Irving J. Selikoff, Mt. Sinai Hospital, 11 East 100th Street, New York, New York, a witness to be produced, sworn and examined on the part of the above-named plaintiff by one of the court reporters of SOUTHERN DISTRICT COURT REPORTERS, United States Court House, Foley Square 7, New York.

FIRST INTERROGATORY:	Please state your name, residence and place of business.
SECOND INTERROGATORY:	Please state your pfofession.
THIRD INTERROGATORY:	Please state how long you have been engaged in the practice of such profession.
FOURTH INTERROGATORY:	Please state where you received your preliminary training.
FIFTH INTERROGATORY:	Please state where you received your intern training.
SIXTH INTERROGATORY:	Please state what additional training you have had.
SEVENTH INTERROGATORY:	Please state whether or not your license to practice medicine is on record in some county in the State of New York, if so, state which county.
EIGHTH INTERROGATORY:	Do you practice medicine as a full time occupation?

NINTH INTERROGATORY: Are you associated with any clinic or medical group? If so, please state the name.

TENTH INTERROGATORY: Do you belong to any professional society or group? If so, please state which one.

ELEVENTH INTERROGATORY: Do you practice in any field of medical specialty? If so, please state in which specialty you engage.

TWELFTH INTERROGATORY: If you have had any specialized medical training, please state what it was and where such specialized medical training was taken.

THIRTEENTH INTERROGATORY: For the benefit of the jury, please state your age and the number of years you have been actively engaged in the practice of medicine.

FOURTEENTH INTERROGATORY: Have you ever written any articles concerning your field of specialty, given any lectures, or received any special awards or citations for service in your field of specialty?

FIFTEENTH INTERROGATORY: Please state where you are presently residing and practicing medicine.

SIXTEENTH INTERROGATORY: Please state whether or not you have ever had occasion to see any x-ray films on the plaintiff, Claude J. Tomplait.

SEVENTEENTH INTERROGATORY: If you have answered "Yes" to Interrogatory No. 16, please state the date of your examination of such x-ray films.

EIGHTEENTH INTERROGATORY: In all of your answers to the questions calling for medical opinion and conclusion, please state such based upon reasonable medical certainty.

NINETEENTH INTERROGATORY: Were the x-ray films that you previously examined sent to you by Orange Memorial Hospital, in Orange, Texas, and did such films bear the appropriate x-ray markings, identifying them as being x-rays taken of Claude J. Tomplait?

TWENTIETH INTERROGATORY: Please state your diagnosis, based upon your examination of such x-rays, of the condition from which plaintiff is suffering, basing your answers to this question upon reasonable medical certainty.

TWENTY-FIRST INTERROGATORY: Please state to the jury your background of study and knowledge dealing with the illness of asbestosis, fully explaining to the jury the background of your qualifications so that the jury might be able to judge for themselves your experience in this field and the weight that they might wish to give to your testimony.

TWENTY-SECOND INTERROGATORY: As to the inquiry above as to your diagnosis and by that is meant what you in your medical judgment believe the x-rays portray of this patient, please state the detailed basis for your conclusion.

TWENTY-THIRD INTERROGATORY: It may be contended in this case by some medical witness that the x-ray films portray a case of emphysema as distinguished from that of asbestosis. Will you please state what features of the x-rays, in your opinion, differentiate and distinguish Mr. Tomplait's situation from that of emphysema, non-occupational in origin, if you have in fact answered the previous inquiries to the effect that you believe this patient is suffering from asbestosis.

TWENTY-SECOND INTERROGATORY: When were the first publicized reports made public dealing with the dangerous nature of asbestos fibers and their relationship to the disease of asbestosis?

TWENTY-THIRD INTERROGATORY: Mr. Tomplait has been an asbestos worker for about 25 years. Has information been available to the industry manufacturing asbestos insulating materials that asbestos fibers caused asbestosis during substantially most of this 25 year period?

TWENTY-FOURTH INTERROGATORY: In connection with your answer to the preceding question, please describe the source of such information that has been available to the industry and whether or not studies were made by any governmental agency or by any of the members of the insulating industry concerning the connection between the disease of asbestosis and the use of asbestos.

STEPHENSON, THOMPSON AND MORRIS

By 
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

NO. 5402

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC., ET AL

NOTICE AND INTERROGATORIES TO BE PROPOUNDED TO DR. IRVING J. SELIKOFF

LAW OFFICES
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The Tomplait v. Combustion Engineering Case File (1962-1969), Deposition notice and interrogatories, Dr. Irving S...
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