IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
MAR 7 1968 19...
M
James R. Cooney, Clerk, U. S. Court
By Margaret Turner DEPUTY

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO.5402

COMBUSTION ENGINEERING, INC., ET AL :

INTERROGATORIES PROPOUNDED TO DEFENDANTS R & I REFRACTORY AND INSULATION CORPORATION AND COMBUSTION ENGINEERING, INC.

TO: R & I REFRACTORY AND INSULATION CORPORATION and COMBUSTION ENGINEERING, INC. and STRONG, PIPKIN, NELSON AND PARKER, P. O. Box 1632, Beaumont, Texas 77704, Attorneys for said 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: In answer to our previous Interrogatory No. 2, you stated no warnings were required because the products and materials manufactured by your companies were not dangerous. Please explain how you came to such conclusion if no studies were made as indicated by your answer to Interrogatory No. 3.

INTERROGATORY NO. 2: In regard to any of the materials manufactured or distributed by either of you containing asbestos or asbestos fibers, did you or either of you at any time have knowledge of the fact that inhalation of asbestos fibers could cause the disease asbestosis?

INTERROGATORY NO. 3: If in answer to the preceding interrogatory, you knew that such inhalation could cause the disease asbestosis, please explain why no precautionary warnings were given on the products that you manufactured or distributed containing asbestos.

INTERROGATORY NO. 4: Please explain, if you knew the products you distributed containing asbestos were dangerous and could cause asbestosis, why did you continue to sell and distribute such products knowing that they could cause a disease which might be fatal, particularly in view of the fact that you did not give any warnings, you did not distribute any type of safety equipment or instructions accompanying the distribution of such products.

INTERROGATORY NO. 5: In answer to our previous Interrogatory No. 7, you stated that you do not recognize that prolonged use of certain insulating materials manufactured by you can cause or contribute to cause asbestosis. Please explain what you understand to be the cause of the disease asbestosis.

STEPHENSON, THOMPSON AND MORRIS

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

CERTIFICATE OF SERVICE BY MAIL

A copy of the foregoing Interrogatories has been forwarded to Strong, Pipkin, Nelson and Parker, P. O. Box 1632, Beaumont, Texas 77704, on this the 4 day of March, 1968, by Certified Mail, Return Receipt Requested.

Ward Stephenson

NO. 5402

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC., ET AL

INTERROGATORIES PROPOUNDED TO DEFENDANTS R & I REFRACTORY AND INSULATION CORPORATION AND COMBUSTION ENGINEERING, INC.

LAW OFFICES
STEPHENSON, THOMPSON & MORRIS
STEPHENSON BUILDING
ORANGE, TEXAS

The Tomplait v. Combustion Engineering Case File (1962-1969), Interrogatories to Combustion Engineering and R...
ACL Doc 10745 · Page 4 of 4
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