IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
APR 12 1968
M
James R. Cooney, Clerk, U. S. Court
By Mildred C. Verret
DEPUTY

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

COMBUSTION ENGINEERING, :
INC., ET AL :

NOTICE and INTERROGATORIES

TO: Mr. Ben L. Reynolds
Royston, Rayzor and Cook
Attorneys at Law
877 San Jacinto Building
Houston, Texas 77002

Attorney for Defendant EAGLE-PICHER INDUSTRIES, INC.

Mr. John D. Rienstra
Attorney at Law
707 Beaumont Savings Building
Beaumont, Texas 77701

Attorney for Defendant OWENS-CORNING FIBER GLASS CORPORATION

Mr. John Tucker
Attorney at Law
Orgain, Bell and Tucker
Beaumont Savings Building
Beaumont, Texas 77701

Attorney for Defendant GUSTIN-BACON MANUFACTURING COMPANY

Mr. George A. Weller
Attorney at Law
P. O. Box 350
Beaumont, Texas 77701

Attorney for Defendant FIBERBOARD PAPER PRODUCTS CORPORATION

Mr. Charles S. Pipkin
Attorney at Law
P. O. Box 1632
Beaumont, Texas 77704

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

Mr. George E. Duncan
Attorney at Law
Beaumont Savings Building
Beaumont, Texas 77701

Attorney for Defendants PITTSBURGH PLATE GLASS COMPANY and PITTSBURGH CORNING CORPORATION

Mr. Gordon R. Pate
Attorney at Law
1119 Beaumont Savings Building
Beaumont, Texas 77701

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

Gentlemen: Please take notice that the deposition of the Office Manager or other Officer of Johns-Manville Sales Corporation, 2825 W. 11th Street, Houston, Texas, 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 Dahl & Reed, Court Reporters, Houston First Federal Building, Houston, Texas.

STEPHENSON, THOMPSON AND MORRIS

By Ward Thompson
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 THE OFFICE MANAGER OR OTHER OFFICER OF JOHNS-MANVILLE SALES CORPORATION

Interrogatories to be propounded to the Office Manager or other officer of Johns-Manville Sales Corporation, a witness to be produced, sworn and examined on the part of the above-named plaintiff by Dahl & Reed, Court Reporters, Houston, Texas:

FIRST INTERROGATORY: Please state your full name and address.

SECOND INTERROGATORY: By whom are you employed and in what capacity?

THIRD INTERROGATORY: Please state the date or dates that Claude J. Tomplait has been employed by your company since the year 1950.

FOURTH INTERROGATORY: Please state the date or dates that the employment of Claude J. Tomplait with your company ended.

FIFTH INTERROGATORY: Please state the exact location or locations where Mr. Tomplait worked for your company. For example, the Bridge City Power House for Gulf States Utilities Company, Bridge City, Texas, or Gulf Oil Corporation project, Port Arthur, Texas, etc.

SIXTH INTERROGATORY: Please state whether or not Claude J. Tomplait was employed by you as an insulator.

SEVENTH INTERROGATORY: If Mr. Tomplait was not employed as an insulator, in what capacity was he employed?

EIGHTH INTERROGATORY: Please state exactly what types of insulation was used by Mr. Tomplait in his work for your company, giving the manufacturers' name and address.

NINTH INTERROGATORY: Please give the full description of what this insulation consisted of, such as asbestos, figerglas, rock wool, foam glass, thermabestos, etc.

TENTH INTERROGATORY: Please state the names of any materials used by Mr. Tomplait in which asbestos constituted any portion, also giving the manufacturers' name and address.

STEPHENSON, THOMPSON AND MORRIS

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

NO. 5402

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC.,
ETAL

INTERROGATORIES TO BE
PROPOUNDED TO THE OFFICE
MANAGER OR OTHER OFFICER OF
JOHNS-MANVILLE SALES CORPORATION

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

The Tomplait v. Combustion Engineering Case File (1962-1969), Deposition notice and interrogatories to Johns-Ma...
ACL Doc 10796 · Page 5 of 5
Published by AsbestosClaims.Law
asbestosclaims.law/library/10796/5