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

FILED
APR 17 1968 19
James R. Cooney, Clerk, U. S. Court
By Margaret Turner DEPUTY

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

ANSWER OF OWENS-CORNING FIBERGLAS CORPORATION TO SECOND SET OF INTERROGATORIES

Comes now Owens-Corning Fiberglas Corporation and in response to the second set of interrogatories served upon it by the plaintiff makes the following answers thereto, such answers to each interrogatory bearing the same number as the request:

-1-

Since 1958 Owens-Corning Fiberglas has manufactured a calcium silicate insulation product which is sold under the trade names "Kaylo" and "Kaylo 20". Kaylo products contain approximately 13 - 22% asbestos fibers.

-2-

The statement referred to in defendant's prior answer to this interrogatory was first printed on the packaging materials for Kaylo products in 1967. As noted below this statement was adopted in following a practice previously established by another insulation products manufacturer.

-3-

Defendant has no information or belief that any studies as referred to in this interrogatory have been made.

-4-

The only product manufactured by defendant which contains asbestos fibers is its calcium silicate product sold under the trade name "Kaylo" and "Kaylo 20".

-5-

Neither plaintiff's prior interrogatory No. 7 nor this defendant's answer thereto was limited to the disease

"asbestosis". Owens-Corning has no information or belief that prolonged use of its products containing asbestos fibers will cause "asbestosis".

-6-

The statements referred to in this interrogatory were adopted by Owens-Corning following a practice established previously by another insulation product manufacturer having extensive experience with products containing asbestos fibers.

-7-

Defendant's answer to this interrogatory is the same as to the prior interrogatory No. 2.

-8-

No answer required as defendant's answer to interrogatory No. 7 is not in the negative.

-9-

Defendant's answer to plaintiff's previous interrogatory No. 3 is not correctly stated in this interrogatory No. 9; further, this interrogatory assumes an answer to the preceding interrogatory which is not the answer given by defendant.

DATED this 16th day of April, 1968.

KING, SHARFSTEIN & RIENSTRA

BY: John D. Rienstra

707 Beaumont Savings Building
Beaumont, Texas
Attorneys for Defendant,
Owens-Corning Fiberglas
Corporation

THE STATE OF TEXAS, §
§
COUNTY OF JEFFERSON. §

Before me, the undersigned authority, on this day personally appeared John D. Rienstra, attorney of record for the defendant in the above styled and numbered action, duly authorized to make this affidavit, and having been first duly sworn upon his oath states that the answers and



*The Tomplait v. Combustion Engineering Case File (1962-1969), Answers to second interrogatories* Published by AsbestosClaims.Law
ACL Doc 10749 · Page 2 of 4 asbestosclaims.law/library/10749/2

statements contained in the foregoing Answers to Second Set of Interrogatories are true and correct.

John D. Rienstra

Subscribed and sworn to before me by the said John D. Rienstra this the 16th day of April, A.D. 1968.

Louise Larcomb
Notary Public, Jefferson County, Texas.

CERTIFICATE OF SERVICE

I, John D. Rienstra, attorney of record for the defendant in the above styled and numbered action, do hereby certify that a true and correct copy of the above and foregoing Answers to Second Set of Interrogatories was on this the 16th day of April, 1968, served upon the plaintiff by depositing the same in the United States Mail, postage prepaid, addressed to Mr. Ward Stephenson, Stephenson Building, Orange, Texas, attorney of record for the plaintiff.

John D. Rienstra
Attorney for Defendant


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