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 :

FILED
MAY 3 1968
James R. Cooney, Clerk, U. S. Court
By Margaret Driver DEPUTY

NOTICE

TO: Mr. Ben L. Reynolds
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Attorney for Defendants PITTSBURGH PLATE GLASS COMPANY and PITTSBURGH CORNING CORPORATION

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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 Industrial Insulators, Inc., 5521 Armour Drive, Houston, Texas, will be taken on behalf of the plaintiff upon certain written 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 Savings Building, Houston, Texas.

STEPHENSON, THOMPSON AND MORRIS

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

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CLAUDE J. TOMPLAIT	:	
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COMBUSTION ENGINEERING, INC., ET AL	:	

INTERROGATORIES TO BE PROPOUNDED TO THE OFFICE MANAGER OR OTHER OFFICER OF INDUSTRIAL INSULATORS, INC.

Interrogatories to be propounded to the Office Manager or Other Officer of Industrial Insulators, Inc., 5521 Armour Drive, Houston, Texas, 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:	Since the year 1950, has Claude J. Tomplait been employed by your company on one or more jobs?
SECOND INTERROGATORY:	If so, please state whether or not insulating materials containing asbestos were either used by Mr. Tomplait or by others working on the same job?
THIRD INTERROGATORY:	Have you, as an employer of insulators, ever received any warnings or precautions for use to instruct your employees doing insulating work to follow concerning the harmful nature of asbestos, or asbestos fibers, or asbestos dust?
FOURTH INTERROGATORY:	If you have answered the preceding interrogatory "Yes" then please give the details of such warnings or notices giving the wording and where and when such warnings were given.

FIFTH INTERROGATORY: If you have answered the preceding question that such warnings were given, then please state what action you took in response to such warnings to safe guard your workers using or working around asbestos materials.

STEPHENSON, THOMPSON AND MORRIS

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

NO. 5402

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC, ET AL

INTERROGATORIES TO BE PROPOUNDED TO THE OFFICE MANAGER OR OTHER OFFICER OF INDUSTRIAL INSULATORS, INC.

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

The Tomplait v. Combustion Engineering Case File (1962-1969), Deposition notice and interrogatories to Industrial I...
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