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
M 19
James R. Cooney, Clerk, U. S. Court
By Margaret Driver DEPUTY

NOTICE

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

Gentlemen: Please take notice that the deposition of Harold C. Driemeier, Office Manager 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 Savings Building, Houston, Texas.

STEPHENSON, THOMPSON AND MORRIS

By _____
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

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

INTERROGATORIES TO BE PROPOUNDED TO HAROLD C. DRIEMEIER, OFFICE MANAGER OF JOHNS-MANVILLE SALES CORPORATION

Interrogatories to be propounded to Harold C. Driemeier, Office Manager 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:	Your name is Harold C. Driemeier and you are Office Manager of Johns-Manville Sales Corporation?
SECOND INTERROGATORY:	In the previous interrogatories submitted to you, Question No. 3 asked for your records back to 1950. You answered beginning in 1962. Do you have available an employment record of Claude J. Tomplait from the year 1950 until 1962?
THIRD INTERROGATORY:	Is it true that your company sells several types of insulating materials containing asbestos?
FOURTH INTERROGATORY:	Were any warnings or precautions given by your sales company to any purchaser of your products between the year 1950 and 1962 as to safe guards that should be used by any worker using materials containing asbestos?
FIFTH INTERROGATORY:	If such warnings were given, please state the wording of such warnings, to whom they were given and where such warnings were placed.

SIXTH INTERROGATORY: If you did not give any such warnings, then please explain why.

SEVENTH INTERROGATORY: As a sales corporation for Johns-Manville Products Corporation and Johns-Manville Fiber Glass, Inc., is it not true that had you advised prospective purchasers as well as workers who might use asbestos products that these products were dangerous to use and might cause the disease of asbestosis, you would have lost many sales?

EIGHTH INTERROGATORY: Is it true that various of your company's competitors make insulating materials containing no asbestos which do as good a job, or which the manufacturers claim do as good a job, as those products manufactured by your parent corporation containing asbestos?

STEPHENSON, THOMPSON AND MORRIS

By Ward Stephenson

Ward Stephenson
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

NO. 5402

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC., ET AL

INTERROGATORIES TO BE PROPOUNDED TO HAROLD C. DRIERMEIER, OFFICE MANAGER O F JOHNS-MANVILLE SALES CORPORATION

LAW OFFICES
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ORANGE, TEXAS

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