FILED

MAY 8 1968

James R. Cooney, Clerk, U. S. Court

By Emily G. Walker DEPUTY

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

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

ANSWERS TO DIRECT INTERROGATORIES
HAROLD C. DRIEMEIER
JOHNS-MANVILLE SALES CORPORATION

(ORIGINAL)

Taxable Cost $ 37.75
Paid by Plaintiff

DAHL AND REED
COURT REPORTERS
HOUSTON FIRST SAVINGS BLDG.
HOUSTON, TEXAS

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 :

NOTICE

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

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Attorney for Defendant GUSTIN-BACON MANUFACTURING COMPANY

Mr. George A. Weller
Attorney at Law
P. O. Box 350
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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

ORIGINAL SIGNED BY
WARD STEPHENSON

By_____
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

ORIGINAL SIGNED BY
WARD STEPHENSON

By_____
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	X	
VS	X	CIVIL ACTION NO. 5402
COMBUSTION ENGINEERING INC., ET AL	X	

ANSWERS AND DEPOSITION OF HAROLD C. DRIEMEIER, taken on behalf of the Plaintiff, to the accompanying direct interrogatories propounded to him in connection with the above styled and numbered cause, taken before Ronald D. Miller, a Notary Public in and for Harris County, Texas, taken on the 23rd day of April, 1968, in Houston, Harris County, Texas, pursuant to the commission attached hereto.

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HAROLD C. DRIEMEIER,

the witness, was by the notary duly cautioned and sworn to testify the truth, the whole truth and nothing but the truth in answer to the direct interrogatories as hereinafter indicated, testified as follows:

DIRECT INTERROGATORIES

QUESTION NO. 1:

Please state your full name and address.

ANSWER:

Harold C. Driemeier, 2825 West 11th.

QUESTION NO. 2:

By whom are you employed and in what capacity?

ANSWER:

Johns-Manville Sales Corporation, Office Manager.

QUESTION NO. 3:

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

ANSWER:

In 1962, Claude Tomplait worked a total of 123 days consisting of the following: January, one day; February, 20 days; June, three days; July, 23 days; August, 20 days; September, 19 days;

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October, 23 days; November, 19 days; December, five days. In 1963, a total of 12 days consisting of September, five days; October, seven days. In 1964, a total of eight days, all in the month of March.

QUESTION NO. 4:

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

ANSWER:

I do not know.

QUESTION NO. 5:

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, for Gulf Oil Corporation project, Port Arthur, Texas, etc.

ANSWER:

I do not know.

QUESTION NO. 6:

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

ANSWER:

Yes. Asbestos mechanic, we call it.

QUESTION NO. 7:

If Mr. Tomplait was not employed as an insulator,

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in what capacity was he employed?

ANSWER:

(Not applicable).

QUESTION NO. 8:

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

ANSWER:

I do not know.

QUESTION NO. 9:

Please give the full description of what this insulation consisted of, such as asbestos, fiber-glas, rock wool, foam glass, thermabestos,etc.

ANSWER:

I do not know.

QUESTION NO. 10:

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

ANSWER:

I do not know.

Harold C. Driemeier

Harold C. Driemeier

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THE STATE OF TEXAS:

COUNTY OF HARRIS:

SUBSCRIBED AND SWORN TO BEFORE ME on this the 26th day of April, 1968.

HAZEL MANGUM
Notary Public in and for Harris County, Texas
My Commission Expires June 1, 1969
Bonded by Alexander Lovell Lawyers Supply Corp.

Hazel Mangum
Notary Public in and for Harris County, Texas

THE STATE OF TEXAS:

COUNTY OF HARRIS:

I, RONALD D. MILLER, a Notary Public in and for Harris County, Texas, do hereby certify that the facts as stated in the caption hereto are true; that the foregoing answers of the witness, Harold C. Driemeier, were by said witness made before me, and were sworn to and subscribed by him.

Ronald D. Miller, Notary Public in and for Harris County, Texas

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