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

FILED
MAY 22 1968 19
James R. Cooney, Clerk, U. S. Court
By Margaret Driver DEPUTY

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

COMBUSTION ENGINEERING, INC., ET AL :

ANSWERS OF CLAUDE J. TOMPLAIT
TO WRITTEN INTERROGATORIES OF
EAGLE-PICHER INDUSTRIES, INC.

The plaintiff, Claude J. Tomplait, makes the following answers to the written interrogatories propounded by Eagle-Picher Industries, Inc.:

No. 1 I do not believe that I saw any doctors in 1959 and 1960. In 1961, I saw seen by Dr. John Greco, of Bridge City, Texas; Dr. Tom Jones, of Houston, Texas; and another Dr. Jones, of Houston, Texas. I originally saw Dr. Greco for an examination to buy insurance on my home. Later, I saw Dr. Greco because I thought I had something wrong with my heart. He wanted me to see a lung specialist and made arrangements for me to see Dr. Tom Jones in Houston. Dr. Jones put me in the hospital for four days in Houston, and advised me that I had asbestosis.

I do not recall the years, but in addition to Dr. Greco and Dr. Jones, I have seen the following doctors: Dr. Lombardo, of Beaumont, Texas, and Dr. Stanley Finscher of Houston, Texas. I also saw another doctor in Houston, but by agreement the name of this doctor will not be stated.

Through the years, I have been treated for asbestosis and pneumonia.

No. 2 I was in Methodist Hospital in Houston for about four days in 1961. I underwent tests and was advised that I was suffering from asbestosis.

I was in Orange Memorial Hospital two times in the year 1964 for pneumonia.

In addition, I have been to Orange Memorial Hospital Emergency Room on several occasions for oxygen.

No. 3 None that I recall.

No. 4 During the year 1959 I worked for the following employers and earned the following amounts:

Brooks-Fisher Insulating Company . . .	$ 4,508.35
B & B Engineering & Supply Co.	2,292.07

No. 5 During the year 1960 I worked for the following employers and earned the following amounts:

The Fluor Corporation, Ltd.	190.67
B & B Engineering & Supply Co..	3,991.78
The Fluor Corporation, Ltd.	813.13
Armstrong Contracting & Supply Co.. . .	335.08
The Aber Company	1,553.56

No. 6 During the year 1961 I worked for the following employers and earned the following amounts:

I do not have copies of my income tax returns for the years 1961, and I do not recall the names of my employers or my earnings for that year.

No. 7 During the year 1962 I worked for the following employers and earned the following amounts:

Johns-Manville Sales Corp.	$ 4,686.70
B & B Engineering & Supply Co.	171.16
Armstrong Contracting & Supply Corp. .	342.32
Sabine Insulating Co., Inc.	1,221.56
The Aber Company, Inc.	2,271.49

No. 8 I do not have copies of my income tax return for the year 1963, and I do not recall the names of my employers or my earnings for that year.

No. 9 During the year 1964 I worked for the following employers and earned the following amounts:

B & B Engineering & Supply Co.	759.00
Industrial Insulation	268.15
Sabine Insulation Co.	1,227.94
Johns-Manville Sales Corp.	255.76
Triangle Insulation	272.48

No. 10 I did not work during the year 1965 and did not file an income tax return.

No. 11 During the year 1966 I worked for the following employers and earned the following amounts:

Sabine Insulation Co., Inc.	548.80
B & B Engineering & Supply Company. . . .	1,416.80
The Industrial Insulators, Inc.	1,865.30

No. 12 During the year 1967 I worked for the following employers and earned the following amounts:

Sabine Insulation Co., Inc.	6,163.02
B & B Engineering & Supply Company. . . .	2,153.72
Fuller-Austin Insulation Co.	644.00
B & B Engineering & Supply Company	1,262.70

No. 13 During the year 1968, I have only worked for one company, Sabine Insulation Company, and my earnings have been $892.40.

No. 14 As you know, I have had a claim for workmen's compensation benefits in the District Court of Orange County, Texas, and I believe that you have copies of this lawsuit.

I also filed a lawsuit in the 128th District Court of Orange County, Texas, being No. A-14,694, styled Claude J. Tomplait vs. Texas Employers Insurance Association, and as I recall, this lawsuit was filed in September, 1964.

No. 15 Plaintiff objects to this question because it is improper.

No. 16 No answer necessary.

No. 17 Yes.

No. 18 From the Texas Employment Commission, I received $37.00 per week. I made a claim in February, 1963, and received a total of about $962.00 in weekly payments of $37.00 per week.

No. 19 See the pre-trial order and plaintiff's amended complaint.

No. 20 Eagle-Picher Industries supplies asbestos products on many jobs that I worked. Sometimes I used the products and sometimes other workers near me used the products.

No. 21 All of those products named in the answers of Eagle-Picher to plaintiff's interrogatories, PLUS HYLO and 85% Magnesia manufactured by Eagle-Picher.

No. 22 No.

No. 23 I never made application for my employment; I was hired through the union hall.

No. 24 About the 10th day of October, 1967, I received an injury to my left elbow. I saw Dr. Williams of Orange and Dr. Greco of Bridge City for this injury. I was working for Sabine Insulation at the time of this accident. I received $35.00 a week compensation for about two months and that is all that I received.

On or about February 17, 1964, I received an injury to my back while working for Sabine Insulation. I saw seen by Dr. Howard Williams, of Orange, Texas; Dr. H. L. Rudeseal, of Orange, Texas. As I recall, I received the amount of $3,000.00 on account of this injury.

Claude J. Tomplait

CLAUDE J. TOMPLAIT

SWORN TO AND SUBSCRIBED before me, this the 17th day of May, 1968.

Jackie Bean

NOTARY PUBLIC, ORANGE COUNTY, TEXAS