IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
AUG 19 1968
M. 19
James R. Cooney, Clerk, U. S. Court
By DEPUTY

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC., ET AL

CIVIL ACTION NO. 5402

INTERROGATORIES

TO: CLAUDE J. TOMPLAIT, PLAINTIFF, AND/OR HIS ATTORNEY OF RECORD, THE HONORABLE WARD STEPHENSON, STEPHENSON BUILDING, ORANGE, TEXAS:

COMES NOW defendant, Fibreboard Paper Products Corporation, in the above entitled cause, and hereby makes request that in accordance with Rule 33 of the Federal Rules of Civil Procedure, the plaintiff make answer of the truth of all and each of the following relevant matters of fact in the above entitled and numbered cause.

Defendant further notifies you in accordance with the aforesaid Rule 33 of the Federal Rules of Civil Procedure, that within a period of fifteen (15) days after the service of a copy hereof upon you, that you are to deliver to its attorney of record, Geo. A. Weller, P. O. Box 350, Beaumont, Texas 77704, a sworn response to these interrogatories:

1. In plaintiff's third amended complaint filed in this cause, Paragraphs 15 through 37, it has been alleged that you worked on certain jobs during the year specified.

With reference to each job, will you state if you worked with any product manufactured by Fibreboard Paper Products Corporation on said job. If so, specify the name of the employer and the job on which you worked.

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2. In the year 1959, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

3. In the year 1960, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

4. In the year 1961, through August 1, 1961, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

5. During the period of August 1, 1961, through December 31, 1961, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

6. In the year 1962, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and

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the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

7. In the year 1963, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

8. In the year 1964, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

9. In the year 1965, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

10. In the year 1966, did you work with any product manufactured by Fibreboard Paper Products Corporation, and, if so, specify the time, the place and the name of the employer and the job. If you did not work with any product manufactured by Fibreboard Paper Products Corporation, then state that you did not work with such product.

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In connection with your answers to the foregoing interrogatories, the trade name of the product manufactured by Fibreboard Paper Products Corporation in the years indicated was "Caltemp."

11. In the year 1959, did you work outside of the State of Texas at any place other than Brooks-Fisher Insulating Company at the Gallitan Power House in Gallitan, Tennessee?

12. In the year 1960, did you work for any employer outside of the State of Texas; if so, please give the name of the employer and the place where you worked.

13. In the year 1961, did you work outside of the State of Texas; if so, give the name of the employer and the job and place where you worked.

14. If you have stated that you worked with a product manufactured by Fibreboard Paper Products Corporation on any particular job, then please state how you acquired this information since you have testified in your deposition which was taken on December 8, 1967, that you were unable to identify any particular named product on any particular job.

DATED this 13th day of August, 1968.

GEO. A. WELLER
WELLER, WHEELUS & GREEN
P. O. BOX 350
BEAUMONT, TEXAS 77704
ATTORNEYS FOR DEFENDANT,
FIBREBOARD PAPER PRODUCTS CORPORATION

I certify that a true and correct copy of the foregoing interrogatories was served on Mr. Ward Stephenson, Stephenson, Thompson & Morris, Stephenson Building, Orange, Texas, attorney for plaintiff, by mailing a copy by Certified Mail on the 13th day of August, 1968, and a copy was served on all other attorneys of record by mailing a copy by regular United States mail to their respective offices, on the 13th day of August, 1968.

GEO. A. WELLER

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