IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS,

BEAUMONT DIVISION.

FILED

AUG 22 1968

James R. [illegible], Clerk, U. S. Court

By Margaret Turner DEPUTY

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

ANSWER OF COMBUSTION ENGINEERING, INC., AND R AND I REFRACTORY AND INSULATION CORPORATION TO INTERROGATORY AND PORTION OF MOTION FOR DISCOVERY.

Now come the defendants, Combustion Engineering, Inc., and R and I Refractory and Insulation Corporation, in the above-entitled and numbered cause, and in answer to the Interrogatory heretofore served on defendants and the portion of the Motion for Discovery heretofore served on defendants, all as limited by the agreement of the parties and order of the Court in regard to same, show the following:

1. The names and address of the person having sales knowledge, and of the person having medical knowledge and of the person having technical knowledge of the products manufactured by R and I Refractory and Insulation Corporation, are as follows:

(a) Sales Knowledge: F.T. Christenson, C-E Refractories, Division of Combustion Engineering, Inc., P.O.Box 790, Port Kennedy, Pa.

(b) Technical knowledge: A. S. Arwine, C-E Refractories, Division of Combustion Engineering, Inc., P.O.Box 790, Port Kennedy, Pa.

(c) Medical knowledge: Dr. E.F. Murphy, 1000 Prospect Hill Road, Windsor, Connecticut, 06095.


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2. In regard to the information requested in Paragraph 6 of the motion, neither of these defendants manufacture any respirators, but any respirator approved by the U.S. Bureau of Mine Safety for use in dust laden air will reduce the danger, if any, of working with asgestos insulation products; and further, employers and owners of plants and industries should furnish blowers and adequate ventilation on the various job sites.

ATTORNEYS FOR DEFENDANTS, COMBUSTION ENGINEERING, INC., AND R AND I REFRACTORY AND INSULATION CORPORATION;
1014 San Jacinto Bldg., P.O.Box 1632,
Beaumont, Texas.

THE STATE OF TEXAS, §
§
COUNTY OF JEFFERSON. §

Before me, the undersigned authority, on this day personally appeared Charles S. Pipkin, who being first duly sworn, on oath says that he has read over the foregoing answers to interrogatory and to certain parts of plaintiff's motion for discovery, and the answers herein given are true and correct.

SWORN TO AND SUBSCRIBED before me, by Charles S. Pipkin, to certify which witness my hand and seal of office, this 22nd day of August, 1968.

NOTARY PUBLIC IN AND FOR JEFFERSON COUNTY, TEXAS.


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CERTIFICATE OF SERVICE.

I hereby certify that the foregoing answer has been served on the attorneys for the respective parties herein, by placing true and correct copies of said answer in correctly addressed, stamped and sealed envelopes, and depositing same in the United States Mail at Beaumont,Texas, this _____day of _____, 1968, as follows:

Messrs. Stephenson,Thompson and Morris, Stephenson Building, Orange,Texas, attorneys for plaintiff, Claude J.Tomplait;
Mr.Ben L. Reynolds, 877 San Jacinto Bldg., Houston,Texas, Attorney for Defendant, Eagle-Picher Industries, Inc;
Mr. John D. Rienstra, 707 Beaumont Savings Bldg.,Beaumont,Texas, Attorney for Defendant, Owens-Corning Fiber Glass Corporation;
Mr. John G. Tucker, Orgain,Bell & Tucker, Beaumont Savings Bldg., Beaumont,Texas, Attorney for Defendant, Gustin-Bacon Mfg. Co;
Mr. George A. Weller, P.O.Box 350, Beaumont,Texas, Attorney for Defendant, Fiberboard Paper Products Corporation;
Mr. George E. Duncan, Beaumont Savings Bldg.,Beaumont,Texas, Attorney for Defendants, Pittsburgh Plate Glass Company and Pittsburgh Corning Corporation;
Mr. Gordon R. Pate, Beaumont Savings Bldg., Beaumont,Texas, Attorney for Defendants, Johns-Manville Products Corporation and Johns-Manville Fiber Glass, Inc;
Mr. George E. Murphy, San Jacinto Bldg., Beaumont,Texas, Attorney for Intervenors, Queen Insurance Company and The Travelers Insurance Company;
Messrs. Keith, Mehaffy & Weber, San Jacinto Bldg.,Beaumont,Texas, Attorney for Intervenor,Texas Employers Insurance Association.

Attorney for Defendants,Combustion Engineering, Inc., and R & I Refractory and Insulation Corporation.


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