IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
AUG 26 1968
James [illegible] Clerk
By [illegible] DEPUTY

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

ANSWER OF DEFENDANT, JOHNS-MANVILLE PRODUCTS CORPORATION, TO MOTION FOR DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the defendant, Johns-Manville Products Corporation, subject to the objections heretofore filed, and makes the following Answers to said Motion:

I.

In reply to Paragraph 5 of said Motion, this defendant states:

(1) That it does not maintain a Medical Research Department, but does contribute financially and/or otherwise support medical research concerning asbestosis and related problems conducted by the following organizations:

(a) Industrial Hygiene Foundation of America;

(b) U. S. Public Health Service Study of Asbestos Workers;

(c) Institute of Occupational and Invironmental Health;

(d) School of Public Health of the University of Pittsburgh.

(2) That it maintains a Scientific Research Department which is not medical in nature, and is directed towards the invention and development of new products. The head of this Department is Dr. Fred L. Pundsack, Johns-Manville Products Corporation, Post Office Box 159, Manville, New Jersey 08835 (Dr. Pundsack is not a medical doctor).

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II.

The description of the respirator inquired about in Paragraph 6 of said Motion is as follows:

M-S-A Custom Comfo - All Dust Filter Type Respirator - Manufactured by Mine Safety Appliances Company, Pittsburgh 8, Pennsylvania (Department of The Interior - Bureau of Mines Approval No. 2168 and No. 2169.)

Gordon Pate
GORDON R. PATE
1119 Beaumont Savings Building
Beaumont, Texas 77701
Attorney for Defendant, Johns-Manville Products Corporation

STATE OF TEXAS /
/
COUNTY OF JEFFERSON /

BEFORE ME, the undersigned authority, on this day personally appeared GORDON R. PATE who, being first duly sworn, on oath says that he has read the foregoing Answers to certain parts of Plaintiff's Motion for Discovery, and the Answers herein given are true and correct, based on the information furnished to the undersigned attorney.

Gordon Pate
GORDON R. PATE

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned authority, by Gordon R. Pate on this the 26th day of August, 1968.

Judy Evans
NOTARY PUBLIC in and for
Jefferson County, Texas

I certify that a true and correct copy of the above and foregoing Answer of the Defendant, Johns-Manville Products Corporation, to Plaintiff's Motion for Discovery, was served on Mr. Ward Stephenson, Stephenson Building, Orange, Texas, by mailing a copy by certified mail on the 26th day of August, 1968.

A true and correct copy of the Answer of Motion for Discovery was served on all other counsel of record by mailing by first class mail on the same date.

Gordon Pate
GORDON R. PATE

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