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

FILED
AUG 27 1968
James ...
By Virginia ...

CLAUDE J. TOMPLAIT	:	
vs.	:	CIVIL ACTION
COMBUSTION ENGINEERING, INC., ET AL	:	NO. 5402

ANSWER OF DEFENDANT, PITTSBURGH CORNING CORPORATION TO INTERROGATORY AND MOTION FOR DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes the Defendant, PITTSBURGH CORNING CORPORATION, and files this its Answer to the single Interrogatory and Motion For Discovery propounded to it by Plaintiff, on or about May 28, 1968:

1. The name, address and title of the person having knowledge of some business activities of Pittsburgh Corning Corporation is Roy E. Fuhs, One Gateway Center, Pittsburgh, Pennsylvania 15222, who is Sales Manager of Pittsburgh Corning Corporation. Mr. E. A. Spardy, Assistant Sales Manager of said corporation also has his offices at One Gateway Center, Pittsburgh, Pennsylvania, 15222.

2. The person having technical knowledge, including the materials manufactured and the ingredients thereof is Dr. Lee B. Grant, Medical Director of PPG Industries, Inc., who is not directly employed by Pittsburgh Corning Corporation, but who renders certain staff services to this Defendant. This Defendant is unable to supply the name of anyone other than Dr. Grant in connection with this inquiry, since Dr. Grant is the only one who is knowledgeable in this area, who does render such services to this Defendant.

3. In answer to Paragraph numbered 6, Defendant, Pittsburgh Corning Corporation, does not manufacture respirators, but upon information and belief, and based upon said information and belief, would allege that the following types of respirators, among others, would materially reduce or completely eliminate the disease of asbestosis, if used by the workers applying asbestos materials:

(1) MSA Custom Comfo-All Dust filtered type Respirator, manufactured by Mine Safety Appliances Company, Pittsburgh 8, Pennsylvania (Department of Interior, Bureau of Mines Approval No. 2168 and 2169).

(2) DUPOR No. 46 Respirator, manufactured by H. S. Cover Company, P. O. Box 2508, Station A, South Bend, Indiana, 46614 (Department of Interior, Bureau of Mines Approval No. BM 2 124).

WELLS, DUNCAN AND BEARD

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing Answer of Defendant, Pittsburgh Corning Corporation to Interrogatory and Motion For Discovery was, on the 26th day of August, 1968, served upon counsel for each of the other parties herein by depositing the same in the United States Mail, in correctly addressed, stamped and sealed envelopes to:

Mr. Ben L. Reynolds
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877 San Jacinto Building
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CIVIL ACTION NO. 5402

CLAUDE J. TOMPLAIT

vs.

COMBUSTION ENGINEERING, INC., ET AL

ANSWER OF DEFENDANT, PITTSBURGH CORNING CORPORATION TO INTERROGATORY AND MOTION FOR DISCOVERY

LAW OFFICES OF
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