FILED
SEP 1 - 1968
James R. Cooney, Clerk
By: Hayes E. Kirkland

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

CLAUDE J. TOMPLAIT	(	
	)	
V.	(	CIVIL NO. 5402
	)	
COMBUSTION ENGINEERING, INC., ET AL	(	

ANSWER OF DEFENDANT EAGLE-PICHER INDUSTRIES, INC. TO INTERROGATORIES AND MOTION FOR DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant Eagle-Picher Industries, Inc. and for Answer to the single Interrogatory propounded by the Plaintiff on or about May 28, 1968 would show as follows:

1.

Lowell D. Graves, Assistant General Sales Manager, 900 American Building, Cincinnati, Ohio.

James D. Dickerson, Manager, Product Development, 900 American Building, Cincinnati, Ohio.

Herman L. Huelster, General Works Manager, Fibers and Minerals Division, C and Porter Streets, Joplin, Missouri.

2.

Subject to objections previously filed to Plaintiff's Motion for Discovery, served on or about May 28, 1968, this Defendant makes the following Answers to said Motion.

(1) and (2) Samples of the representative groups of the products inquired about are being deposited with the Clerk.

(3) Copies of current sales literature is being supplied.

(4) No answer is required.

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(5) Information previously furnished in Answer to Interrogatory. No medical department is maintained.

(6) When adequate ventilation is not possible respirators approved by the United States Bureau of Mines for pneumoconiosis producing dust should be used.

Respectfully submitted,

Ben L. Reynolds
of Royston, Rayzor & Cook
877 San Jacinto Building
Houston, Texas 77002
Attorneys for Defendant,
Eagle-Picher Industries, Inc.

AFFIDAVIT

THE STATE OF TEXAS (
)
COUNTY OF HARRIS (

BEFORE ME, the undersigned authority, on this day personally appeared Ben L. Reynolds who first being duly sworn on oath says that he has read the foregoing Answers to Interrogatories and Answer to certain parts of Plaintiff's Motion for Discovery and the answers herein given are true and correct based on information supplied.

Ben L. Reynolds

SWORN TO and SUBSCRIBED BEFORE ME on this the 7th day of August, 1968.

Notary Public in and for
Harris County, Texas

CERTIFICATE OF SERVICE

A copy of the foregoing Answers to Interrogatories and Motion for Discovery was served on Mr. Ward Stephenson, Stephenson Building, Orange, Texas 7630, Attorney for Plaintiff by mailing a copy postage prepaid to the above stated address on this date, and a copy was served on all other attorneys of record by mailing a copy to their respective addresses on this the 30th day of August, 1968.

Ben L. Reynolds

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V.

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ANSWERS OF DEFENDANT TO INTERROGATORIES

ROYSTON, RAYZOR & COOK
ATTORNEYS AT LAW
SAN JACINTO BUILDING
HOUSTON, TEXAS

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