FILED

SEP 1 1968

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

CLAUDE J. TOMPLAIT :

VS. : CIVIL NO. 5402

COMBUSTION ENGINEERING, INC., ET AL :

PLAINTIFF'S ANSWERS TO WRITTEN INTERROGATORIES PROPOUNDED BY DEFENDANT FIBERBOARD PAPER PRODUCTS CORPORATION

In answer to the written interrogatories propounded by defendant Fiberboard Paper Products Corporation, plaintiff says the following:

1.

I will try to answer this question to correspond with the paragraphs in the complaint.

(15) I do not recall that Pabco products were used by me or other employees working around me on this particular job.

(16) I could very well have worked with Pabco products on this job, and probably did. Other employees working for other employers may have also used these particular products.

(17) I know that I worked around magnesium and it could have been Pabco's products.

(18) I do not recall that Pabco products were used by me or other employees working around me on this particular job.

(19) I know that on this job I worked around magnesium and it could have been Pabco's products.

(20) I could very well have worked with Pabco products on this job, as well as other employees working for other employers.


Published by AsbestosClaims.Law
asbestosclaims.law/library/10784/1

(21) I do not specifically recall working with Pabco's products on this job, but I remember that there were lots of other workers on this job, and I believe that they were working with Pabco products.

(22) See answer to No. 21.

(23) I cannot be positive whether or not I worked with Pabco products on these jobs or not.

(24) I could very well have worked around Pabco products on this job.

(25) I was not working with Pabco products myself on this job, but there were lots of other workers on this job and I believe they were working with Pabco products.

(26) I do not believe that I worked around Pabco products on this particular job.

(27) I do not recall if I worked with Pabco products on this job, but I believe other employees working around me were working with Pabco products.

(28) I cannot be positive whether or not I worked with Pabco products on these jobs or not.

(29) I do not recall working with Pabco products on this job.

(30) I may have worked with Pabco products on this job, and also, this was a large job and there were other contractors on the job, and their employees may have also worked with Pabco products.

(31) I worked with a lot of 85% magnesium on this job, and it could have been Pabco's product.

(32) I don't believe I worked with Pabco products on this job.

(33) I worked with 85% magnesium on this job, which could have been Pabco's products.

(34) I believe that I worked with Pabco products on this job.

(35) I cannot recall whether or not I worked with Pabco products on this job.

(36) I do not recall if I worked with Pabco products myself on this job, but other employees working for other contractors on this job were working with Pabco products, as I recall.

2.

Yes, in 1959 I could have worked around or with either Caltemp or 85% magnesium on the Brooks-Fisher Insulating Company job. Other contractors were on this job and their employees could very well have been using Pabco products.

3.

Yes, in 1960 when I worked for The Fluor Corporation at Kaplan, Louisiana, I could very well have worked with Pabco products. Also in 1960 when I worked for Armstrong Contracting and Supply Corporation on the Firestone job, I could very well have worked with Pabco products.

4.

Yes, in 1961 when I worked for Armstrong Contracting And Supply Corporation on the Firestone job, I could very well have worked with Pabco products. I do not recall the exact date in 1961 that I worked on this job.

5.

Yes, in 1961 when I worked for The Aber Company at the Gulf States Power House, I could have used Pabco products and also other workers working around me could have been using Pabco products.

6.

I am not certain. I believe that when I worked for The Aber Company at the Gulf Oil Refinery, I worked with Foamglas mostly.

In 1962 when I worked for Sabine Insulation at the Firestone Plant and Levingston Shipbuilding, I cannot be certain if I worked with Pabco products or not.

In 1962 when I worked for Armstrong at the Firestone plant, I could very well have worked with Pabco products.

In 1962 when I worked for Johns-Manville at the Bridge City Power House, I don't believe I was working with Pabco products, but I believe other workers working for other contractors were using Pabco products.

In 1962 when I worked for The Aber Company at the Gulf States Power House, I could have worked with Pabco products and also other workers working for other contractors could have been using Pabco products.

7.

In 1963 when I worked for Sabine Insulation at Firestone and Levingston, I do not know whether I worked with Pabco products or not.

In 1963 when I worked for Insulation Engineers, Inc. in Pascagoula, Mississippi, I could have worked with Pabco products, and also other workers working for other contractors could have been using Pabco products.

In 1963 when I worked for Triangle Insulation at the Houston Chemical Plant, I worked with a lot of 85% magnesium, and it could very well have been Pabco's product.

8.

In 1964 when I worked for Triangle Insulation at the Houston Chemical Plant, I worked with a lot of 85% magnesium, and it could very well have been Pabco's product.

In 1964 when I worked for Industrial Insulation at the Jefferson Chemical Plant, I believe that I worked with Pabco products on this job.

In 1964 when I worked for Sabine Insulation at Firestone and Levingston, I do not recall whether I worked with Pabco products or not.

In 1964 when I worked for Johns-Manville at the Gulf States Power Plant, I do not recall if I worked with Pabco products or not, but other employees working for other contractors on this job were working with Pabco products.

9.

I did not work for anyone in the year 1965.

10.

In 1966 I worked for Industrial Insulators at the Bridge City Power House, and I recall that I worked with Pabco products on this job.

In 1966 I worked for B & B Engineering & Supply Company at the DuPont job, and I recall that there was Pabco products on the job and I worked with this material.

In 1966 I worked for Sabine Insulation Co. at the O-I paper mill, and I feel sure that I worked with Pabco products on this job.

11.

No.

12.

Yes, in 1960 I worked for The Fluor Corporation at Kaplan, Louisiana.

13.

No.

14.

When I gave my deposition in December, 1967, at that time I did not know the names or trade names of the materials manufactured by Fiberboard Paper Products Corporation. After I gave my deposition, I was advised that Fiberboard is the manufacturer of 85% magnesium and Caltempt. During my lifetime as an insulator, I had seen and worked around 85% magnesium and Caltemp, but I did not know who manufactured

these products. I note from your answers to interrogatories that you began manufacturing 85% magnesium in 1925, and Caltemp in 1956, so I feel certain I have worked with these products at different times and places.

WITNESS MY HAND this the 20th day of August, 1968.

Claude J. Tomplait
CLAUDE J. TOMPLAIT

SWORN TO AND SUBSCRIBED before me on this the 20th day of August, 1968.

Jackie Bean
NOTARY PUBLIC, ORANGE COUNTY, TEXAS


Published by AsbestosClaims.Law
asbestosclaims.law/library/10784/6

NO. 5402

CLAUDE J. TOMPLAIT

VS.

COMBUSTION ENGINEERING, INC., ET AL

PLAINTIFF'S ANSWERS TO WRITTEN INTERROGATORIES PROPOUNDED BY DEFENDANT FIBERBOARD PAPER PRODUCTS CORPORATION

LAW OFFICES
STEPHENSON, THOMPSON & MORRIS
STEPHENSON BUILDING
ORANGE, TEXAS

The Tomplait v. Combustion Engineering Case File (1962-1969), Response to Fibreboard interrogatories
ACL Doc 10784 · Page 7 of 7
Published by AsbestosClaims.Law
asbestosclaims.law/library/10784/7