COPY.

ECH/DE

Tuesday
8th December,
1953.

Mr. P. W.Appe,
Ward 5, Cubicle 27,
Broomfield Hospital,
BROOMFIELD, Nr.Chelmsford,
Essex.

Dear Sir,

We have received from the Ministry of National Insurance copy of Certificate of Suspension issued to you following recent examination by The Pneumoconiosis Medical Board, of which no doubt,you have received the original.

We understand that at the same time that this certificate is issued a further one is sent to you giving the degree of disability and in order that we may record the whole of the information to our Board, can you please advise us what this degree of disablement is recorded as ?

We should also be glad of details of any employment in which you were engaged before you joined us or in the intervals of employment with this Company.

You are at liberty, of course, to withhold this information, but we think it would be to your interest to furnish the same so that our records in the case can be complete.

Yours faithfully,

For NEWALLS INSULATION COMPANY LTD.,

OFFICE MANAGER.

COPY.

ECH/DE

Monday
4th January,
1954.

Mr. P. W.Appe,
Ward 5, Cubicle 27,
Broomfield Hospital,
Broomfield, Nr.Chelmsford,
Essex.

Dear Sir,

We wrote you on the 8th December asking for certified particulars of your disablement, but cannot trace having received your reply.

As we wish to complete certified returns to our Board, could you let us have the information per return.

Yours faithfully,

For NEWALLS INSULATION CO. LIMITED.

OFFICE MANAGER.

Enc.Stamped envelope.

Copy

Darracotts,
16 John Street,
Bedford Row,
London, W.C.1.

Ref. A.8327

6th June 1956.

Newalls Insulation Co. Ltd.,
Purley Way,
Croydon.

Dear Sirs,

Mr. P. W. Apps

We refer you to our letter of even date and shall be obliged if you will let us have a schedule showing our client's earnings during the time that he was in your employ.

Yours faithfully,

(Sgd.) Darracotts.

Copy

Darracotts,
Solicitors,
16 John Street,
Bedford Row,
London, W.C.1.

Ref No.A.8327

Newalls Insulation Co. Ltd.
Purley Way,
Croydon.

6th June 1956.

Dear Sirs,

Mr. P. W. Apps
20 Jupps Road, E.1.

We have been instructed by the above named to claim damages for personal injuries, loss and expense sustained by him whilst in your employ during 1952 and the early part of 1953.

Our instructions are that our client was employed by you as an asbestos sprayer at various places during this period, and he was caused to spray asbestos in circumstances in which he has suffered an injury to his lungs.

We are instructed that you are fully aware of these circumstances, and we shall be glad to know whether you admit liability and whether you are prepared to compensate our client for the injury and damage that he has sustained.

Yours faithfully,

(Sgd.) Darracotts.

JAMES CHAPMAN & Co
SOLICITORS

TELEPHONE
BLACKFRIARS 4488 (3 LINES)
TELEGRAMS "REDRESS MANCHESTER"

P. O. BOX 394,
23. JOHN DALTON STREET,
MANCHESTER, 2.

Mc/DD.

RECEIVED
21 JUN 1954
T. & N. LTD.
MANCHESTER

Dear Sir,

AUNJ/MB - Newalls Insulation Co. Ltd.
Asbestosis Claim - P. W. Apps.

We thank you for your letter of the 18th instant enclosing the file of papers.

You may be aware that the Solicitors, Messrs. Darracotts of London, are a firm who have a reputation of acting in speculative cases, although we think they also act now for one Trade Union.

We are communicating with the Solicitors and enclose a copy of our letter for your use.

It is said in the papers before us that repeated requests have been made to Apps to supply details, presumably of his disablement, but he has ignored all the communications. We should like to have copies of all the letters addressed to the workman and to have particulars of any oral requests that were made to him. Please also let us have the letter of the 2nd December, 1953 and Certificate of Suspension from the Medical Board. 1

In Mr. Hornsby's letter of the 14th June, he says that from time to time the men had been circularised as to the necessity of wearing masks. He attaches a copy of the circular letter of the 1st December, 1954. The workman, Apps, was not employed by you at that time, having apparently been absent from employment from the 15th May, 1953. We must, therefore, have copies of all circular letters or other communications which had been sent to the workmen prior to May, 1953. 2

We shall also require a detailed list of the man's earnings during the period of his employment. It will be helpful if the list can be sent to us in duplicate. 13

Will you be good enough to obtain this further information and pass it to us.

Yours faithfully,

Messrs. Turner & Newall Ltd.,
Asbestos House,
77/79, Fountain Street,
MANCHESTER, 2.

9. 1003

20th June, 1956.

Mc/DD.

[redacted]

Dear Sirs,

A.8327 - Newalls Insulation Co. Ltd.
and Anor.

Our Clients, Messrs. Newalls Insulation Co. Ltd., have consulted us in this matter and we have before us your letter of the 6th June.

We are satisfied on the information at present before us that there is no liability on our Clients for any disease or disability suffered by your Client.

We observe that your letter under reply does not state any grounds on which our Clients could be liable and we should be interested to know in what respects you are alleging our Clients were in breach of any duty owed to your Client.

Yours faithfully,
JAMES CHAPMAN & CO.

Messrs. Darracotts,
Solicitors,
16, John Street,
Bedford Row,
LONDON, W.C.1.

[redacted]

W. L. McClure, Esq.,
The Washington Chemical Co. Ltd.,
Washington.

ADMJ/MB 18th June 1956.

Dear Mr. McClure,

Common Law Claim

Asbestosis - Mr. P. W. Apps

I am just writing to acknowledge with thanks your two letters of 11th and 15th June and enclosures. The point that strikes one in this case is that Apps was only working for you for some 2½ years out of the fourteen that elapsed between his first joining you and his being certified as suffering from Asbestosis. Clearly it is of great importance to know what he was doing in the meantime, and in view of his unco-operative attitude I think that the only thing to do is to bring Messrs. James Chapman & Co. into the case as soon as possible.

I have, therefore, written to Mr. McKenna to-day with such information as we have, and I will keep you advised of developments.

Yours faithfully,

ADM

Secretary.

32

Dc 72

A. E. McKenna, Esq., Monday,
Messrs. James Chapman & Co., 18th June,
P.O. Box 394, 1956.
23 John Dalton Street,
Manchester, 2.

Dear Mr. McKenna,

Newalls Insulation Co. Ltd.

Asbestosis Claim - P. W. Apps

We have received another Asbestosis claim by a Spray Operative of Newalls Insulation Co. Ltd., and we should be much obliged if you would again act for us. We enclose the original letters from Messrs. Darracotts, Solicitors, who are acting for the claimant, neither of which has been acknowledged, together with a copy statement received from Newalls, which is submitted as a matter of routine as soon as a man has been certified as suffering from Asbestosis. We also enclose copies of letters from Mr. McClure, which call for no comment. They establish that the disease is Asbestosis and contain information from Newalls' London Area about safety arrangements.

The most significant thing from our point of view is that Apps was only working for Newalls for 2½ years, though we do not know, of course, who else he had been working for during the eleven or so years since he first joined the Company in 1942.

This gives you all the information at present in our possession, but if there is anything further you would like done please let us know.

Yours faithfully,

for TURNER & NEWALL LIMITED,

ADM

ADMJ/MB Secretary.
Encs.

NATIONAL INSURANCE (INDUSTRIAL INJURIES) ACT, 1946

National Insurance (Industrial Injuries) (Prescribed Diseases) Regulations, 1948

CERTIFICATE OF SUSPENSION

Surname (BLOCK CAPITALS) ..... APPS .....

Other Names ..... Prince William .....

Address ..... 20, Jupps Road, Bow .....

..... London E.3. .....

National Insurance No. | LL | 99 | 32 | 23 | D |

In pursuance of the above-mentioned regulations, we, a Pneumoconiosis Medical Board, have found the person named above to be suffering from*

Pneumoconiosis accompanied by Tuberculosis

hereby certify that we suspend him from further employment after ... 16th ... November ... 19 53 .... in any of the occupations included in the list overleaf, with the exceptions (if any) and subject to the conditions (if any) set out below:

4 775

Da-7

File

Return to AJ after perusal

W. L. McClure, Esq.,
The Washington Chemical
Co. Ltd.,
Washington, Co. Durham.

ADNJ/EH

25th June, 1956.

Dear Mr. McClure,

Asbestosis Claim - P. W. Apps

This is just to acknowledge with thanks your letter of 22nd June and enclosures. I note that you are in course of obtaining the further information requested by Messrs. James Chapman & Co., and I look forward to hearing from you again in due course.

Yours faithfully,

ASW

Secretary.

9 996

Da 72

Full Name and address	Prince William Apps, 20, Jupps Road, Bow, London, E.3.
Date of Birth	25th April 1925
Date of Joining the Company	30.12.42 Left 4.10.43 20.11.46 " 26. 3.47 5.10.51 " 6. 2.53 18. 2.53 " 15. 5.53
Details of employment with the Company	Qualified Spray Operative applying Asbestos Fibre by the Spray process for Thermal and Spray Insulation.
Details of employment for five years prior to joining Company	Not known
Number of years spent working in scheduled Areas	Nil
Date of disablement	16.11.53 (Absent from work from 15.5.53)
Degree of disablement	Repeated requests have been made to Apps to supply details but he has ignored all our communications. The Pneumoconiosis Medical Panel of 25 Gordon Street, London, W.C.1. affirm that they cannot furnish the necessary details, without the consent of Apps who has not answered their letters in connection with giving his consent.

THE WASHINGTON CHEMICAL CO. LTD.
WASHINGTON

TO
A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

YOUR REF. ADNJ/MB OUR REF. WLM/EG 22nd June, 1956.

RECEIVED 25 JUN 1956 T. & N. LTD. MANCHESTER

Dear Mr. Jones,

Asbestosis Claim - P. W. Apps

Thank you for your letter of the 21st June regarding the further information required by Messrs. James Chapman & Co. I have asked Mr. Hornsby to let me have the copies of the letters addressed to Apps and any communications which have been sent to workmen prior to May 1953 in connection with the wearing of masks. He is also supplying a detailed list of the man's earnings.

In the meantime I am enclosing the letter of the 2nd December 1953 and the Certificate of Suspension, together with a copy of a letter dated 14th April from the Pneumoconiosis Medical Panel advising us that they had written to Apps but had received no reply to their letter. This letter was in reply to ours advising that we could receive no answer to our letters to Apps and asking them if they would let us know the degree of disability.

Yours faithfully,

Encs:

COPY

The Ministry of National Insuran
Pneumoconiosis Medical Panel
25 Gordon Street,
London, W.C.1.

14th April, 1954.

Your Ref: JBG/EG

Dear Sir,

re:- Prince William Apps
30 Jubbs Road, Bow, E.C.3.

With reference to your letter of the 8th April, the papers have been returned here by our Headquarters.

The information you have asked for is confidential to the Ministry and we are, therefore, unable to supply you with it, without the consent of Mr. Apps.

We have written Mr. Apps to ask if he is willing for the information to be supplied, but to date, no reply has been received to our letter.

Yours faithfully,

Sgd. ?

Clerk to the Panel

B. Graham, Esq.,
Income Tax and Pensions Department,
Newalls Insulation Co. Ltd.,
Washington,
Co. Durham.

THE WASHINGTON CHEMICAL CO. LTD.
WASHINGTON

TO
A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

YOUR REF. ADNJ/MB OUR REF. WLM/EG 22nd June, 1956.

PI
25 JUN 1956
T. & N. LTD.
MANCHESTER

Dear Mr. Jones,

Asbestosis Claim - P. W. Apps

Thank you for your letter of the 21st June regarding the further information required by Messrs. James Chapman & Co. I have asked Mr. Hornsby to let me have the copies of the letters addressed to Apps and any communications which have been sent to workmen prior to May 1953 in connection with the wearing of masks. He is also supplying a detailed list of the man's earnings.

In the meantime I am enclosing the letter of the 2nd December 1953 and the Certificate of Suspension, together with a copy of a letter dated 14th April from the Pneumoconiosis Medical Panel advising us that they had written to Apps but had received no reply to their letter. This letter was in reply to ours advising that we could receive no answer to our letters to Apps and asking them if they would let us know the degree of disability.

Yours faithfully,

Encs:

COPY

The Ministry of National Insurance,
Pneumoconiosis Medical Panel,
25 Gordon Street,
London, W.C.1.

14th April, 1954.

Your Ref: JBG/EG

Dear Sir,

re:- Prince William Apps
30 Jupps Road, Bow, E.C.3.

With reference to your letter of the 8th April, the papers have been returned here by our Headquarters.

The information you have asked for is confidential to the Ministry and we are, therefore, unable to supply you with it, without the consent of Mr. Apps.

We have written Mr. Apps to ask if he is willing for the information to be supplied, but to date, no reply has been received to our letter.

Yours faithfully,

Sgd. ?

Clerk to the Panel

J. B. Graham, Esq.,
Income Tax and Pensions Department,
Newalls Insulation Co. Ltd.,
Washington,
Co. Durham.

92

Da 12

W. L. McClure, Esq.,
The Washington Chemical Co. Ltd.,
Washington.

ADMJ/MB

21st June 1956.

Dear Mr. McClure,

Asbestosis Claim - P. W. Apps

Further to my letter of 18th June, I have now received a letter from Messrs. James Chapman & Co., in this matter, containing a request for further particulars as follows -

"It is said in the papers before us that repeated requests have been made to Apps to supply details, presumably of his disablement, but he has ignored all the communications. We should like to have copies of all the letters addressed to the workman and to have particulars of any oral requests that were made to him. Please also let us have the letter of the 2nd December 1953 and Certificate of Suspension from the Medical Board.

In Mr. Hornsby's letter of the 14th June, he says that from time to time the men had been circularised as to the necessity of wearing masks. He attaches a copy of the circular letter of the 1st December 1954. The workman, Apps, was not employed by you at that time, having apparently been absent from employment from the 15th May 1953. We must, therefore, have copies of all circular letters or other communications which had been sent to the workmen prior to May 1953.

We shall also require a detailed list of the man's earnings during the period of his employment. It will be helpful if the list can be sent to us in duplicate."

I should be glad if you would kindly let me have these particulars in due course. In the meantime, you may like to know that Messrs. James Chapman & Co. have denied liability and have asked in what respects it is alleged that N.I.Co.Ltd. were in breach of any duty owed to Apps.

Yours faithfully,

ADMJ

Secretary.

Messrs. James Chapman & Co.,
P.O. Box 394,
23 John Dalton Street,
Manchester, 2.

Thursday,
21st June,
1956.

Dear Sirs,

Newalls Insulation Co. Ltd.

Asbestosis Claim - P. W. Apps

We thank you for your letter in this matter received here to-day, and we note the additional information you would like to have. We are writing to-day to obtain this from Newalls Insulation Co. Ltd.

We have come across Messrs. Darracotts of London before.

Yours faithfully,
for TURNER & NEWALL LIMITED,

ADMJ

ADMJ/MB

Secretary.

A. E. McKenna, Esq.,
Messrs. James Chapman
& Co.,
23 John Dalton Street,
Manchester, 2.

Wednesday,
18th July,
1956.

Dear Mr. McKenna,

Newalls Insulation Co, Ltd.

Asbestosis Claim - P. W. Apps

Thank you for your letter of 17th July, which I shall of course need to refer to N.I.Co.Ltd. I am much obliged to you for having sent me an additional copy which I will simply pass on to them and I will let you know as soon as I receive their reply.

Yours faithfully,

for TURNER & NEWALL LIMITED,

ADNJ/PMT

Secretary.

JAMES CHAPMAN & Cº
SOLICITORS

TELEPHONE:
BLACKFRIARS 4466 (3 Lines)
TELEGRAMS "REDRESS, MANCHESTER"

P. O. BOX 394.
23. JOHN DALTON STREET.
MANCHESTER, 2.

YOUR REF
OUR REF Mc/BW

19th July, 1956.

Dear Mr. Jones,

re: Asbestosis Claim - P.W.Apps.
- Newalls Insulation Co.Ltd.

Thank you for your letters of the 12th and 13th July.

Can you now ascertain for me whether or not I am right in assuming that the circular letter of 1st December, 1954, was the first written instruction as to the necessity of respirators being worn.

Mr. Hornsby, in his letter of 28th June, says "the availability of masks can always be proved by the number which we have bought over the years". Can we have a schedule, showing the number of employees on spray contracts, and the number of masks issued and the number of purchased masks over the period 1942 to 1943 or over such shorter period as there are records available. I would like the schedule prepared now, and the records retained, otherwise they can be mislaid.

I would also like to have the address of the foreman, Brewer, so that we may arrange for him to be seen.

Yours sincerely,

A.D.N. Jones, Esq.,
Messrs. Turner & Newall, Ltd.,
77/79, Fountain Street,
MANCHESTER, 2.,

W. L. McClure, Esq.,
The Washington Chemical Co. Ltd.
Washington.

ABMJ/AML

13th July, 1956.

Dear Mr. McClure,

Newalls Insulation Co. Ltd.

Asbestosis Claim - P. W. Apps

Further to my letter of yesterday, I have received from Messrs. James Chapman & Co. a copy of Messrs. Darracotts' letter in reply to their request for further particulars of the claim. Messrs. James Chapman & Co. have replied confirming their instructions to accept service of and defend any proceedings.

I enclose a copy of Darracotts' letter to Messrs. James Chapman & Co., and I will keep you advised of any further developments.

Yours faithfully,

Secretary.

Enc.1.

JAMES CHAPMAN & Cº
SOLICITORS

TELEPHONE:
BLACKFRIARS 4468 (2 lines)
TELEGRAMS "RECORESS, MANCHESTER"

P. O. BOX 394,
23. JOHN DALTON STREET,
MANCHESTER 2.

QUOTE
Our Ref

Mc/BW

12th July, 1956.

RECEIVED
16 JUL 1956
T. & N. Ltd.
MANCHESTER

Dear Mr. Jones,

re: Newalls Insulation Co. Ltd.
- P.W. Apps.

Thank you for your letter of the 3rd instant, with its enclosures, which I have read with interest.

I now await the further information as to the correspondence and the Lists of earnings.

Since last writing to you I have heard from Messrs. Darracotts, and enclose copies of their letter to which I have replied confirming that we have instructions to accept service of and defend any proceedings.

The Secretary,
Messrs. Turner & Newall Ltd.,
77/79, Fountain Street,
MANCHESTER, 2.

Yours faithfully,
Stephen E. McKenna

1 718

DARRACOTTS

SOLICITORS. 16, John Dalton Street,
Bedford Row,
London, W.C.1.

A.8327.

Messrs. James Chapman & Co.,
23, John Dalton Street,
Manchester, 2.,

Dear Sirs,

Apps v. Newalls Insulation Co.Ltd.Mc/DD

We duly received your letter of the 20th instant, contents of which we note.

The allegations of negligence alleged against your clients are, inter alia, as follows :-

1. They caused or permitted our client to work with liquid asbestos on occasions without a respirator, and on other occasions with a respirator which was unsuitable and defective.

2. They failed to provide our client with adequate protective clothing.

3. They failed to warn our client of the danger that existed in working with such liquid asbestos.

4. They failed to provide a safe system of work.

In view of your clients' denial of liability we are instructed to issue a Writ and shall be glad to know whether you are prepared to accept service, or whether you would prefer the same to be served upon your clients.

Yours faithfully,

DARRACOTTS.

3r

Da 72

Messrs. James Chapman & Co.,
P.O. Box 394,
23 John Dalton Street,
Manchester, 2.

Thursday,
12th July,
1 9 5 6.

Dear Sirs,

Newalls Insulation Co. Ltd.

Asbestosis Claim - P. W. Apps

Further to our letter of 3rd July we now have pleasure in enclosing copies of three letters to Apps dated respectively 6th December 1953, 4th January 1954 and 30th January 1954, together with a statement, in duplicate, of Apps' earnings during the period of employment with N.I.Co. Ltd. You will note that a copy of the letter dated 30th January 1954 was addressed to Apps at his home in case he had, by then, left hospital. With regard to the statement of earnings, you will see that it does not cover the full period of Apps' employment, but we are advised that wages records from 30th December 1942 to 4th October 1943 are no longer available.

We think that with these documents we have provided all that is available of the information requested in your letter received on 21st June, but if there is anything further we can do please let us know.

Yours faithfully,

for TURNER & NEWALL LIMITED,

ADMJ/EH
Encs.

Secretary.

7 781

THE WASHINGTON CHEMICAL CO. LTD.
WASHINGTON

TO
A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

YOUR REF. OUR REF. WLM/EG 10th July 1956.

Dear Mr. Jones,

Asbestosis Claim - P. W. Apps

As requested in your letter of the 21st June I am enclosing the information required by Messrs. James Chapman & Co. in connection with the man's earnings during the period of employment with us. You will note that this does not cover the full period, but Mr. Hornsby advises me that the wage records from 30th December 1942 to 4th October 1943 are no longer available.

Yours faithfully,

Enc:

1 182

Mr. P. W. Apps (No.460)

Earnings from 20th November 1946 to 26th March 1947	(18½ weeks)	£133. 8. 3d.
Earnings from 5th October 1951 to 6th February 1953	(70 weeks)	£749. 9. 1d.
Earnings from 18th February 1953 to 15th May 1953	(12½ weeks)	£114. 2. 4d.

7 105

THE WASHINGTON CHEMICAL CO. LTD.
WASHINGTON

A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

S.W. 133

YOUR REF.

OUR REF. WLM/EG

4th July, 1956

RECEIVED
3 JUL 1956
T. & N. LTD.
MANCHESTER

Dear Mr. Jones,

Asbestosis Claim - P. W. Apps

With further reference to your letter of 21st June, I am now enclosing copies of three letters which were written to Apps asking for particulars of his certification. You will note that the copy of the letter of the 30th January 1954 was also sent to Apps' home address.

Yours faithfully,

Enc:

7 107

COPY.

ECH/DE

Mr. P. W.Apps,
Ward 5, Cubicle 27,
Broomfield Hospital,
Broomfield; Nr. Chelmsford,
Essex.

Saturday
30th January,
1954.

Dear Sir,

We wrote you on the 8th December and followed this up on the 4th January respecting the certificate of Suspension issued by the Pneumoconiosis Medical Board in respect to your case.

Our Head Office have asked us to endeavour to obtain from you the degree of disability so that they might complete this information in their records. They also requested details of any employment in which you were engaged either before you joined us or during the intervals of your employment with this Company.

We have not had a reply to either of our communications and are wondering if the same have gone astray. It is of course at your own discretion whether you give us this information, but as we have stated previously, we think it would be to your interest that the fullest information should be on record with us.

A stamped addressed envelope is enclosed for your reply.

Yours faithfully,

For MEWALLS INSULATION COMPANY LTD.,

OFFICE MANAGER.

to:- Mr.P.W.Apps,
20, Jupps Road,
Bow, London, E.3.

T 163

Aq.72

copy of original

A. E. McKenna, Esq.,
Messrs. James Chapman & Co.,
23 John Dalton Street,
Manchester, 2.

Wednesday,
1st August,
1956.

Dear Mr. McKenna,

Newalls Insulation Co. Ltd.

Asbestosis Claim - P. W. Apps

Further to my letter of 18th July, I now enclose two bundles of correspondence which I have received from Mr. McClure. On top of the first bundle is a letter from Mr. Hornsby to Mr. McClure of 30th July 1956, which serves as an explanation of the matters contained in that bundle, and at the head of the second bundle is a letter of 24th July 1956, also from Mr. Hornsby to Mr. McClure, which serves as a brief list and explanation of the documents attached to it. The remainder of this letter includes a reply to the questions raised in your letter of the 17th July, but you will see that Mr. Hornsby has not given the number of employees on the Spray Contracts and Mr. McClure writes that he has asked Mr. Hornsby to get out some figures and will let us have them as soon as they are available.

Amongst the documents attached to Mr. Hornsby's letter of the 24th July are two long duplicated Instructions, one entitled "Sprayed Limpet Asbestos" and the other being the Admiralty Specification for the application of Sprayed Limpet Asbestos. It may save you trouble if I mention that these have been included only because each contains one reference to respirators, and in each case this reference has been marked in red.

Among the enclosed documents are a number of original letters which Mr. McClure has asked to be returned when the case has been completed.

Yours faithfully,

for TURNER & NEWALL LIMITED,

Secretary.

ADNJ/AML
Encs.

COPY

From

Newalls Insulation Co. Ltd.,
London Area.

WLM/AL

To

W. L. McClure,
Head Office.

ECH/DE

2nd Aug

Dear Mr. McClure,

Asbestosis Claim - P. W. Apps

Replying to yours of the 31st ultimo, we have estimated the number of men employed on Spray work and think the following to be a reasonable average per week for the years shown:-

1948	....	18
1949	....	24
1950	....	21
1951	....	25
1952	....	50
1953	....	58

The above figures scan reasonably well with the number of respirators purchased, as detailed in our letter of the 24th ultimo, with the exception of 1951 where, according to our records, only 12 respirators were purchased. We are inclined to think that an item has been missed, but unfortunately we cannot check our figures, as our records for the period have been destroyed. These respirators are bought from Baxter's and we are wondering whether you could check the same through your records for the year 1951.

Yours faithfully,

Sgd. E. C. HORNSBY

Copy of original

NEWALLS INSULATION CO. LTD.
WASHINGTON.

A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

YOUR REF. OUR REF. WLM/AL 31st July 1956

RECEIVED
1 AUG 1956
T. & N. LTD.
MANCHESTER

Dear Mr. Jones,

Asbestosis Claim - P. W. Apps

With further reference to your letter of 18th July, I am enclosing copies of letters from Mr. Hornsby dated 24th and 30th July giving the further information which Mr. McKenna requires. I have asked Mr. Hornsby to extract further details regarding the number of men employed on Spray work at that time, and as soon as I have his reply I will send it on to you.

I am sending the documents in duplicate in order that you can pass one copy on to Mr. McKenna and you will note that as far as possible I have included the original copies from Mr. Hornsby's files, and I should be glad if these could be returned when the case has been completed.

I am sure you will agree that London Area have gone to a great deal of trouble in extracting the documents which I am enclosing, and these should be of considerable help to us in defending the claim.

Yours faithfully,

Encls.

25×10

THE WASHINGTON CHEMICAL CO. LTD.
WASHINGTON

TO
A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

Da 72

YOUR REF. ADNJ/PMT OUR REF. WLM/EG 19th July, 1956.

RECEIVED
20 JUL 1956
T. & N. LTD.
MANCHESTER

Dear Mr. Jones,

Asbestosis Claim - P. W. Apps

Thank you for your letter of the 18th July enclosing a copy of a letter from Mr. McKenna asking for further information. I have asked London Area for the information, and as I think there is a mistake in one of the dates I have asked for details over the period 1942 to 1953 and not 1943.

As soon as I have a reply I will write to you again.

Yours faithfully,

2

Da 72

R. M. Boniwell, Esq.,
The Washington Chemical Co. Ltd.,
Washington, Co. Durham.

JAEC

ADMJ/AML 15th August, 1957.

Dear Mr. Boniwell,

Newalls Insulation Co. Ltd.

Asbestosis Claim - P. W. Apps

Following your mention of this case in a recent telephone conversation, I have looked at the papers and I regret to note that we did not specifically advise you of Messrs. James Chapman & Company's belief that this claim has been abandoned. To complete your files, I enclose a copy of their letter of the 29th July 1957.

When Mr. McClure first wrote to me about this case in July 1956 he sent me a bundle of correspondence which he asked me to return in due course, and this correspondence I enclose herewith.

Yours faithfully,

ASW

Encs. Secretary.

Da 72

JAMES CHAPMAN & Co
SOLICITORS

TELEPHONE:
BLACKFRIARS 4466 (3 LINES)
TELEGRAMS "REDRESS, MANCHESTER"

P. O. BOX 394,
23, JOHN DALTON STREET,
MANCHESTER, 2.

Mc/BW 31st July, 1957.,

Dear Sir,

re: Asbestosis Claim - P.W.Apps.
Newalls Insulation Co. Ltd.,

We thank you for your letter of yesterday's date, and acknowledge safe receipt of the cheque for £10.10.0d. in payment of our charges. The receipt is endorsed on the cheque.

Yours faithfully,

The Secretary,
Messrs. Turner & Newall Ltd.,
Asbestos House,
77/79, Fountain Street,
MANCHESTER, 2.,

Da 72

A. E. McKenna, Esq.,
Messrs. James Chapman & Co.,
P.O. Box 394,
23 John Dalton Street,
Manchester, 2.

Tuesday,
30th July,
1957.

Dear Mr. McKenna,

Newalls Insulation Co. Ltd.

Asbestosis Claim - P. W. Apps

Thank you for your letter of the 29th July, reminding me that it is over twelve months since you wrote to Messrs. Darracotts denying liability in this case. I note that the letter was not acknowledged and that you think it is now reasonably safe to assume that the claim has been abandoned. This is very satisfactory to hear.

Thank you also for enclosing the various papers which we originally sent you.

Finally, I am obliged to you for sending a note of your charges and I have pleasure in enclosing our cheque for £10.10. Od. in settlement thereof.

Yours faithfully,

for TURNER & NEWALL LIMITED,

ADNJ

Secretary.

ADNJ/AML
Enc.1.

JAMES CHAPMAN & Cº
SOLICITORS

TELEPHONE:
BLACKFRIARS 4468 (2 LINES)
TELEGRAMS "REDRESS, MANCHESTER"

ARTHUR E. MCKENNA
A. S. DUNDALE, LL.B.
G. F. L. HOYLE

QUOTE
OUR REF

P. O. BOX 394.
23, JOHN DALTON STREET.
MANCHESTER, 2.

Mc/BW
Enc:

29th July, 1957.,

Dear Mr. Jones,

Newalls Insulation Co. Ltd., -
Asbestosis Claim - P.W. Apps.

It is now over twelve months since, on 27th June, 1956, we wrote to the Claimant's Solicitors, Messrs. Darracotts, denying liability. The letter was not acknowledged, and I think it is now reasonably safe for us to assume the claim has been abandoned.

We are therefore closing our file, and return your papers to you.

I enclose a short note of our own charges, which I trust you will find satisfactory.

Yours sincerely,

Arthur E. McKenna

A.D.N. Jones, Esq.,
Messrs. Turner & Newall Limited,
Asbestos House,
77/79, Fountain Street,
MANCHESTER, 2.,

Your Ref. MA/EM

A. N. McKenna, Esq.,
Messrs. James Chapman & Co.,
P.O. Box 394,
23 John Dalton Street,
Manchester, 2.

Monday,
27th Aug.,
1956.

Dear Mr. McKenna,

Newalls Insulation Co. Ltd.

Asbestosis Claim - P. W. Apps

In Mr. Jones' absence on holiday I am replying to your letter to him of 25th August with regard to this case. I note what you say in the second paragraph of your letter and I certainly think it advisable that you should deal with this claim personally yourself, at least so far as the investigation is concerned, and also I think the whole conduct of the Defence if you would be good enough to do so.

Yours sincerely,

JLC.

JLC/MAJ

P.S. I see that Apps is now ill and that he has worked for N.I. Co. Ltd. for less than three years since they first employed him in 1948, i.e. fourteen years' ago. The nature of his occupation during the rest of the fourteen year period may prove to be very material when we find this out.

JLC

JAMES CHAPMAN & Cº
SOLICITORS
TELEPHONE:
BLACKFRIARS 4466 (3 LINES)
TELEGRAMS "REDRESS, MANCHESTER"

P. O. BOX 394.
23. JOHN DALTON STREET,
MANCHESTER, 2.

QUOTE OUR REF

Mc/BW

25th August, 1956.,

Dear Mr. Jones,

Newalls Insulation Co.Ltd., -
Abestosis Claim - P.W. Apps.

On my return to the Office I have read with interest the recent correspondence and enclosures, and have again considered this case. We have not heard anything further from Messrs. Darracotts.

In my opinion we have here all the material for the building up of a sound Defence to the claim, and if it is to be pressed I would like to personally conduct the investigation into the evidence, and if the investigation confirms my present view that we have a good Defence, then the claim is one to be contested throughout. We seem to have here as good a case as we can expect to find, and if we can raise a successful Defence it will be of tremendous value to us in any future cases to be able to point to a Judgment in our favour.

I should perhaps mention specifically that the investigation and Defence generally could be handled by experienced Solicitors in London, at less expense, and I can, if you wish, instruct Solicitors in London on your behalf to deal with the matter if and when proceedings are instituted.

Yours sincerely,

Arthur E. McKenna

A.D.N. Jones, Esq.,
Messrs. Turner & Newall Ltd.,
Asbestos House,
77/79, Fountain Street,
MANCHESTER, 2.,

Copy

Newalls Insulation Co. Ltd,
London Area.

W. L. McClure, Esq.,
Head Office.



Your Ref: WLM/EG Our Ref: ECH/DE 30th July 1956

Dear Mr. McClure,

Asbestosis Claim - P. W. Apps

Following my letter of the 24th instant, I thought it would also be interesting to get a statement from our Supervisor, Mr. H. White, now in retirement, who took over Asbestos Spray on shipping at the end of 1942 when this work was first passed to us by J. W. Roberts Ltd. At the time he was responsible for recruiting Spray staff and for training them and Apps was actually one of the men whom he transferred from ordinary labouring to Spray.

I now enclose herewith statement received from White and in order that you may see that this was not prompted or sponsored in any way, I also attach copy of my personal note to Mr. White on this subject which has brought this reply.

To sum up, therefore, you now have copies of the circulars I myself issued over the period when I was responsible, we have Mr. White's written statement, a verbal statement from Mr. Brewer and a verbal statement from Mr. Strachan, all of whom are willing to repeat the same to our Solicitors. If there is any further step you wish taken please let me know.

Yours faithfully,

Sgd. E. C. HORNSBY

copy of original

1

COPY

44 Guildford Road
Ilford,
Essex.
28th July, 1956.

Dear Sir,

In reference to your letter of the 25th re P. W. Apps, Labourer, working on Spray Limpet Asbestos contracts, as Supervisor of these contracts I never sent a man to contract without a respirator and a clean packet of filter pads and insisted they be used while work was in progress. I warned the men they would be sacked if I caught them not wearing the respirators owing to the danger of the materials; also on ships I insisted all door and port holes to be kept open, to allow fresh air in. Note no defective respirator was issued from office. In reference to protective clothing, this was not issued to any men working on these contracts. I am sorry I have not got any circulars, only a drawing of shipping cleats.

In reference to your Solicitors, I would be willing to furnish a statement if required, also to assist the Company in any details.

Yours sincerely,

Sgd. H. WHITE.

copy of original

2

1 170

Copy Letter from Newalls Insulation Co. Ltd
Croydon.

ECH/DE 25th July, 1956.

Mr. H. White,
44 Guildford Road,
Ilford,
Essex.

Dear Harry,

There is a matter on which you can be of considerable assistance to me.

You will remember that towards the end of 1942 we took over from J. W. Roberts the application of Asbestos Spray to Shipping and you became the Supervisor responsible for the same.

Apparently at the time we had a young Labourer named Prince William Apps, who on 7.4.43 was transferred to the Spray side for training as a Spray operative. He remained with us until 4.10.43 when he was released by the National Service Officer. He was subsequently re-engaged on 20.11.46 for Spray work and was with us until 26.3.47, when he was dismissed as unsatisfactory. He was re-engaged on 5.10.51 and left on 15.5.53, on the grounds of ill health.

We learned subsequently that he had entered a Sanatorium and later on it was established as a case of Asbestosis, which as you know, nowadays comes within the scope of the National Health Insurance Scheme.

We are now however faced with a claim for damages on the grounds of negligence, Apps stating that we caused or permitted him to work with liquid asbestos on occasions without a respirator and on occasions with a respirator which was unsuitable and defective.

That we failed to provide Apps with protective clothing.

That we failed to warn him of the danger that existed in working with such liquid asbestos, and

That we failed to provide a safe system of working.

continued.....

The essential thing is this question of a respirator, i.e. whether it was made clear to Apps that the wearing of a respirator was essential whilst engaged on the Spray process, secondly that a respirator was provided and, thirdly, what precautions we took to see that the same was worn.

Will you please let us have any specific information you can give us on the case of Apps or, failing that, your general views on the steps taken for providing and checking the wearing of respirators for Spray men.

It is possible that our Solicitors might wish to take a statement from you and we should be glad to learn if you would be willing to furnish the same.

If you have by you any copies of circulars which might have been issued to workmen from time to time on the question of wearing respirators, perhaps you would let us have the same.

I am sorry to trouble you in this matter, but as no doubt I shall be involved personally, I should welcome any information you can give me which will prove the care we used to take on this point.

Yours sincerely,

Sgd. E. C. HORNSBY

CERTIFIED COPY OF AN ENTRY OF DEATH

GIVEN AT THE **GENERAL REGISTER OFFICE**

Application Number G006053

REGISTRATION DISTRICT Hackney

1963 DEATH in the Sub-district of Hackney South West in the Metropolitan Borough of Hackney

Columns:–	1	2	3	4	5	6	7	8	9
No.	When and where died	Name and surname	Sex	Age	Occupation	Cause of death	Signature, description and residence of informant	When registered	Signature of registrar
435	Sixteenth December 1963 St Joseph's Hospital Hackney	Prince William APPS	Male	38 years	Cf 15 Langley Gardens Barking Essex Cork Insulator	1(a) Glioblastoma of left frontal lobe of brain Certified by A.E. Ross M.R.C.S	D. APPS Brother 61 Brady Street Mansions E.1	Sixteenth December 1963	K Woodman Registrar

CERTIFIED to be a true copy of an entry in the certified copy of a Register of Deaths in the District above mentioned.

Given at the GENERAL REGISTER OFFICE, under the Seal of the said Office, the 25th day of February 1999

DXZ 560261

See note overleaf

CAUTION:-It is an offence to falsify a certificate or to make or knowingly use a false certificate or a copy of a false certificate intending it to be accepted as genuine to the prejudice of any person or to possess a certificate knowing it to be false without lawful authority.

GENERAL REGISTER OFFICE ENGLAND

MS

Form DXZ Dd 0113 (012946) 65M 7/98 Mcr(203621)

J. B. Graham, Esq.,
The Washington Chemical Co. Ltd.,
Washington, Co. Durham.

WLM

ADMJ/JC

21st April 1954.

Dear Mr. Graham,

Prince William Apps

Thank you for your letter of the 21st April and enclosure giving particulars with regard to the above-named employee who has been certified as suffering from Pneumoconiosis accompanied by Tuberculosis.

I note that you have had considerable difficulty with Mr. Apps in that he has refused to disclose the degree of disablement to you or to permit any details to be given by the Pneumoconiosis Medical Panel. I do not think that you can be expected to do more than write in a case of this kind and if an employee refuses to reply to your letters he must accept the consequences. I do not think that it would be wise to go to the extent of arranging a personal visit to Apps from your London Office. As I was speaking to Mr. McClure this morning on the telephone I mentioned this matter to him and no doubt he will already have spoken to you. This letter really confirms what we then agreed.

Yours faithfully,

A.M.

Secretary.

NEWALLS INSULATION CO. LTD.
WASHINGTON.

Mr. A. D. N. Jones,
Turner & Newall Welfare Trust Ltd,
Manchester.

YOUR REF. OUR REF. JBG/AL 21st APRIL 1954.

RECEIVED 23 APR 1954 T. & N. LTD. MANCHESTER

Dear Mr. Jones,

Prince William Apps

We enclose particulars of the above named employee who has been certified as suffering from "Pneumoconiosis accompanied by Tuberculosis".

We have endeavoured to obtain further details in connection with his degree of disablement, but up to the present Mr. Apps does not appear to be agreeable to disclose the required information.

In view of this we are asking our London office to arrange for a personal visit to Apps, however, should he refuse then it would appear that nothing further can be done to obtain the desired particulars.

Yours faithfully,

ENCLS:

J. B. Graham, Esq.,
The Washington Chemical Co. Ltd.,
Washington, Co. Durham.

WLM

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Yours faithfully,

ADM

Secretary.

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Yours faithfully,

ENCL:

COPY

From: Newalls Insulation Co.Ltd, London Area.

To: J. B. Graham, Esq., Washington.

ECH/HP 14th June, 1956.

Dear Mr. Graham,

Prince William Apps

Replying to your letter of the 9th instant, Apps was engaged by us as a Sprayer. In point of fact he was originally engaged in 1942 on our general covering side, but in 1943 was trained to be a Spray Operator.

With regard to your second paragraph, we can assure you that this question of masks is kept under constant review. It has always been emphasized at Foremen's Meetings, and masks are available and are issued to the men as requisite. We have from time to time circularised the men pointing out the necessity of wearing masks and in 1954 we actually wrote to all our spray workers emphasizing this point as per copy of circular attached and getting a signature from them that they had a respirator and that the same was in efficient condition.

Unfortunately some of these men are very lax even in such a vital matter affecting their own safety and we have had to issue warnings that any man not using a respirator whilst on the spray process will be summarily discharged.

Our foreman at the period mentioned was Mr. E. Brewer who has since left our employ, but we are quite sure that he would not have permitted Apps to do spraying unless he was wearing a respirator, supplies of which were always available.

Sgd. E. C. Hornsby

copy of original

WASHINGTON CHEMICAL CO. LTD.
WASHINGTON

A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

REF. OUR REF. WLM/EG 11th June, 1956

12 JUN 1956 T. & N. LTD. MANCHESTER

Dear Mr. Jones,

Common Law Claim

Asbestosis - Mr. P. W. Apps

I am enclosing two letter which we have received from Messrs. Darracotts, Solicitors, London, claiming damages on behalf of P. W. Apps.

You have on your files particulars of Apps employment with us, and although spread out over 10 years from 1942 only amounts in total to about 3 years. He was rather unsatisfactory as an employee and was discharged on several occasions. You will see from our previous correspondence that we communicated with him several times but received no reply, and the Pneumoconiosis Medical Panel in London also wrote to ask if he was willing for the information regarding his degree of disability to be supplied to us, but they received no reply to their letter. The Pneumoconiosis Medical Panel confirmed on 13th December 1954 that Apps was suffering from asbestosis accompanied by tuberculosis and I sent a copy of their letter to Mr. Collins on 15th December 1954.

Our London Area have been asked to supply all the information they have in connection with the jobs upon which Apps was engaged, and as soon as we receive this information I will send it on to you. They do, however, confirm that masks are always supplied to men engaged on spray work and the foremen have instructions to make sure that masks are worn.

Yours faithfully,

Encs: copy of original

Copy

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Sgd. E. C. Hornsby

copy of original

WASHINGTON CHEMICAL CO. LTD.
WASHINGTON

A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

RW 124

REF. OUR REF. WLM/EG 11th June, 1956

12 JUN 1956 T. & N. LTD. MANCHESTER

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Common Law Claim

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Yours faithfully,

Encs: copy of original

Letter to A. E. McKenna, Esq. - 18th June 1956

The following copy letters were enclosed:-

21st August 1954	Routine Statement when first certified.
10th December 1954	Mr. McClure to Pneumoconiosis Medical Panel enquiring whether asbestosis or silicosis.
13th December 1954	Pneumoconiosis Medical Panel to Mr. McClure confirming asbestosis accompanied by tuberculosis.
11th June 1956	Mr. McClure to Head Office enclosing letters of claim and promising information on Apps' jobs and safety precautions.
15th June 1956	Mr. McClure to Head Office enclosing information on Apps' employment and particulars of precautions taken on Spray Contracts.

THE WASHINGTON CHEMICAL CO. LTD.
WASHINGTON

A. D. N. Jones, Esq.,
Turner & Newall Limited,
Manchester.

YOUR REF. OUR REF. WLM/EG 15th June, 1956.

copy of original

RECEIVED 18 JUN 1956 T. & N. Ltd. MANCHESTER

Dear Mr. Jones,

Common Law Claim

Asbestosis - Mr. P. W. Apps

I have now heard from our London Office regarding Apps' employment with us and I am enclosing a copy of the letter and the circular letter to which it refers.

This adds very little to our knowledge of the circumstances, but it does show that London Area stress to foremen and workmen the need for complying with our instructions as regards the wearing of masks.

Yours faithfully,

Encs:

9 950

Newalls Insulation Co. Ltd.,
London Area.

W. L. McClure, Esq.,
Head Office.

Your ref: WLM/EG Our ref: ECH/DE 24th July, 1956.

Dear Mr. McClure,

Asbestosis Claim - P. W. Apps

Referring to your letter of the 19th instant, together with copy of letter from Solicitors, we are pleased to say that the writer has found an old record file of his whilst he was employed on Contracts, i.e. up to December 1945, and we have found certain documents in the same which show how frequently this question of respirators was stressed to the Foremen and to the Operatives and, in fact, to all concerned, even Salesmen. We are sending you herewith the following :-

Circular letter dated 3.11.43 sent to all Operatives and stressing that strict disciplinary action would be taken if respirators were not worn.

Correspondence with Cardiff 19.11.43 and 23.11.43 detailing type of respirator in use as confirmed by the local Factory Inspector.

Circular to all Spray Foremen dated 7.2.44 issuing new type of Mark 4 respirators and calling for signature for the same.

Notes issued in April 1944 to all Supervisors and Chargehands dealing generally with Spray and sending them detailed Specification for Sprayed Asbestos to Admiralty requirements, the marked paragraph on Page 1 of which stressed that Spray Operators etc. to be provided with approved respirators.

Copy of memo dated 5.11.44 to all Foremen and Chargehands pointing out that the Plasterers of our Sub-Contractors, W. Miller, were to be provided with respirators on such occasions where their men were generally helping our Operatives and stressing that any men anywhere exposed to the Spray process must have respirators, and indicating that further issues were available.

Correspondence 21st and 27th November 1944 again stressing that the Plasterers of Sub-Contractors, Millers, must be provided with respirators which we would supply.

Circular, November 1945, issued to all our Salesmen

cont'd....