PLAINTIFF'S EXHIBIT
01308.00
ALL-STATE LEGAL®

Exhibit # 901
Case #
U.S. DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

STATE OF CONNECTICUT)
) SS. Bridgeport
COUNTY OF FAIRFIELD)

C E R T I F I C A T I O N

THIS IS TO CERTIFY that the attached is a true and accurate copy of the Stipulation and Agreement, Form for Notice to Employer in Case of Death, Medical Certificate of Death, Notice of Hearing, Letter to Hon. Edward Buckingham from Sec. to the Comm., Letter from Woodhouse Cornwall to Atty. Buckingham, Message to Comp. Comm. from Edward Webste Message from Addie M. Platt and Notice of Hearing

from the records of the Office of Workmen's Compensation Commission, State of Connecticut, Fourth District, in the case of:

Addie M. Platt, Widow of Frederick J. Platt, deceased

vs.

Raybestos-Manhattan Company

and

Hartford Accident & Indemnity Co.; and
The American Surety Company

Given under my hand and seal this 29th day of August, 1978.

JOHN A. ARCUDI,
Workmen's Compensation Commissioner
Fourth District

PLAINTIFF'S EXHIBIT
WV-009079
ALL-STATE LEGAL®

READ CAREFULLY THE OTHER SIDE OF THIS SHEET.

Workmen's Compensation Commission of Connecticut.

NOTICE OF HEARING

ADDIE M. PLATT, Widow of
FREDERICK J. PLATT, deceased

of 161 Bridgeport Ave., Devon, Conn.
Claimant

vs.

RAYBESTOS-MANHATTAN CO.,

of Bridgeport, Conn.

TRAVELERS INSURANCE CO.
HARTFORD ACC. & IND. CO.
AMERICAN SURETY CO.
of HOME INDEMNITY COMPANY
AMERICAN MUT. LIA. INS. CO.
Respondents

Office of
Compensation Commissioner
Fourth Congressional District

You and each of you are hereby notified that the above-entitled matter will be heard with reference to the following questions by the undersigned at his office, Room 404, No. 955 Main Street, Bridgeport, Conn., on the 26 day of June, 1933 at 1:30 P. M. STANDARD TIME

Deceased died November 26, 1932. Claimant alleges death was due to Asbestosis

Notice issued June 2, 1933

Acknowledge receipt of this notice at once.

E. T. BUCKINGHAM,
Commissioner

Hartford Accident & Indemnity Company
December 26, 1924 to December 26, 1930

American Surety Company
December 26, 1930 to December 26, 1931

The Home Indemnity Company
December 26, 1930 to March 7, 1931

American Mutual Liability Insurance Company
April 1, 1932 to April 1, 1934

Received
JUN 2 - 1933
Compensation Commissioner
Fourth Congressional District

June 26
1:30 P.M.

Yours very truly,

Helen M. Gersch

Secretary to the Commissioner.

(This record has been checked)
HG

READ WITH CARE

In hearings before the Commissioner the burden of proof usually rests upon the person claiming compensation. The claimant should ordinarily be prepared to show (a) that the injury was sustained, (b) that it arose out of and in the course of employment, (c) that the employee was totally or partially incapacitated to work for more than seven days as a result thereof and, (d) if incapacity has ceased before the hearing, how long the incapacity lasted. In other words, the claimant should bring to the hearing, if possible, witnesses to or other evidence of the injury, and especially have present the *physician or physicians* who treated him and can testify concerning the injury and the nature and duration of the disability.

Frequently the burden of proof rests upon the employer. For example, when the employer desires to stop payment of compensation after such payments have been begun, he must prove that the

FREDERIC M. WILLIAMS, CHAIRMAN
FIFTH COMMISSIONAL DISTRICT
LEO J. NOONAN
FIRST COMMISSIONAL DISTRICT
JAMES J. DONOHUE, M. D.
SECOND COMMISSIONAL DISTRICT
CHARLES KLEINER
THIRD COMMISSIONAL DISTRICT
CHARLES E. WILLIAMSON
FOURTH COMMISSIONAL DISTRICT

State of Connecticut

WORKMEN'S COMPENSATION COMMISSION

HARTFORD

OFFICE OF
LEO J. NOONAN
CENTURY BUILDING
64 CHURCH STREET
HARTFORD

TELEPHONE 2-3768

June 1, 1933

Hon. Edward T. Buckingham,
Bridgeport, Connecticut.

Dear Mr. Buckingham:

In Re: Raybestos Company of Bridgeport

We find coverage for the above-named concern from 1917 to 1929, and in December 1929 it apparently becomes the Raybestos-Manhattan, Inc., and in April 1932 Raybestos-Manhattan, Inc. "The Manhattan Rubber Manufacturing Company Division." The record of coverage is as follows:

The Travelers Insurance Company
January 1, 1917 to January 1, 1918
December 2, 1918 to December 2, 1919
December 2, 1920 to December 2, 1921
December 2, 1922 to February 9, 1925

Hartford Accident & Indemnity Company
December 26, 1924 to December 26, 1930

Received
JUN 2 - 1933
Compensation Commissioner
Fourth Congressional District

American Surety Company
December 26, 1930 to December 26, 1931

The Home Indemnity Company
December 26, 1930 to March 7, 1931

American Mutual Liability Insurance Company
April 1, 1932 to April 1, 1934

Yours very truly,

Helen M. Gersch

Secretary to the Commissioner.

(This record has been checked)
HG

WOODHOUSE & CORNWALL

DAVID R. WOODHOUSE, Atty. PERRY H. CORNWALL

INVESTIGATION AND ADJUSTMENT SERVICE,
INSURANCE CLAIMS AND LOSSES

Main Office
983 MAIN STREET
HARTFORD, CONNECTICUT

BRANCH OFFICES

BRIDGEPORT, CONN.
1024 Main Street

NEW HAVEN, CONN.
42 Church Street

SPRINGFIELD, MASS.
93 State Street

PROVIDENCE, R. I.
Union Trust Bldg.

Dated May 29th, 1933 at Bridgeport

Reply to Bridgeport

Atty. E. T. Buckingham, Esq.
Comp. Commissioner, 5th District
955 Main Street
Bridgeport, Connecticut

Dear Sir: Re: Platt vs Raybestos-Manhattan, Inc.

The above employee, Frederick Platt, worked for the Raybestos-Manhattan, Inc. from 1918 until the day of his death, except that he was practically pentioned from February to November, 1932. The widow is making claim for compensation for the death of her husband, claiming asbestosis. This they claim, is an occupational disease.

If they prevail, it seems that all companies who have been on the risk since 1919 should be brought into the case. We understand the Hartford Accident has already been notified and we would thank you to notify all other companies who have been on the risk since 1918.

Very truly yours,

WOODHOUSE & CORNWALL

BY: E. S. Webster
E. S. Webster

ES"":BB

cont. after we receive
ins. coverage for 1919

Received
MAY 31 1933
Compensation Commissioner
Fourth Congressional District

P. O. BOX 1038, HARTFORD, CONN.

D. R. WOODHOUSE, ATT. P. H. CORNWALL

Compensation Commisioner 5th Congressional Dist. DATE 5-25-33

RE-CLAIM NO.

ASSURED Raybestos -Manhattan Inc.

CLAIMANT Frederick Platt (deceased)

Dear Sir.

I find that my company The American Surety Co went on this risk on Dec.26 1930 and The Hartford Accident previous to that The Hartford Accident should by notified of this claim.

Very Truly Yours
Edward S Webster.

Edward S Webster

Copy of notice sent to CO
Rfd. Acc.

Notice issued May 9, 1933

Acknowledge receipt of this notice at once.

E. T. BUCKINGHAM,
Commissioner

May 16, 1933

Mr. E. T. Buckingham
Compensation Commisioner
Bridgeport, Ct.

Gentlemen:

We respectfully acknowledge receipt of your form 17 dated May 9th, 1933.

Yours very truly,

Addie M. Platt
by E. C. Pratt

Addie M. Platt,
161 Bridgeport Ave.
Devon, Conn.

Received
MAY 17 1933
Compensation Commissioner
Fourth Congressional District

due to Asbestosis.

Notice issued May 9, 1933

Acknowledge receipt of this notice at once.

E. T. BUCKINGHAM,
Commissioner

OF THIS SHEET.

Workmen's Compensation Commission of Connecticut.

NOTICE OF HEARING

ADDIE M. PLATT, Widow of
FREDERICK J. PLATT, deceased
of 161 Bridgeport Ave., Devon, Conn.
Claimant

vs.

RAYBESTOS-MANHATTAN CO.,
of Bridgeport, Conn.

AMERICAN SURETY CO.,
of Hartford, Conn.
Respondents

Office of
Compensation Commissioner
Fourth Congressional District

You and each of you are hereby notified that the above-entitled matter will be heard with reference to the following questions by the undersigned at his office, Room 404, No. 955 Main Street, Bridgeport, Conn., on the 9th day of June, 1933 at 2:00 P. M. STANDARD TIME

Deceased died November 26, 1932. Claimant alleges death was due to Asbestosis.

Conn. 130 1

Notice issued May 9, 1933

Acknowledge receipt of this notice at once.

E. T. BUCKINGHAM,
Commissioner

FORM No. 10

Workmen's Compensation Commission of Connecticut.

This form prepared by the Commissioners is proper for ordinary use and is recommended, but any other form or mode of statement, substantially appropriate to the object in view, will also be deemed sufficient.

Ink or typewriter to be used in filling out all forms

FORM FOR NOTICE TO EMPLOYER IN CASE OF DEATH

To Raybestos-Manhattan Co. of Bridgeport, Conn.:
(name of employer) (address)

Notice is hereby given that Frederick J. Platt
(full name of deceased)

of 161 Bridgeport Ave., Devon, Conn. while in your employ
(state accurately residence of deceased)

at East Main St. Plant, Stratford, Conn.
(state place of employment, town, street and street number)

on the exact date unknown day of 19, sustained injuries arising out of and in the course of his employment, as follows: (state nature of injury in ordinary language)

Asbestosis.

June 9 '33

as a result of which he died on the 26th day of November 19 32

The undersigned

Erase words not used.

was at or before the death of the deceased dependent upon him for support.

~~is executor or administrator of the estate of the deceased which is in settlement in the~~

Probate Court for District of

Compensation is claimed in the interest of Addie M. Platt

Dated at Devon, Conn. this 2nd day of May 19 33

Addie M Platt
Dependent ~~Executor~~ ~~Administrator~~
(erase words not used)

In the presence of

Eugene C Bergeron

Charles Worrall Jr
(two witnesses should sign.)

Note—For the protection of both parties, the employer should note date when this notice was received and the dependent, executor or administrator should keep a copy of this notice with date of service. This notice should be served upon the employer by personal presentation or registered mail.

Travelers Insurance Co.

COPY

Vital Statistics

Medical Certificate of Death

1. PLACE OF DEATH

County New Haven

Township Milford or Village Devon or

City ____ No. 161 Bridgeport Ave. St., ____ Ward

(If death occurred in a hospital or institution, give its NAME instead of street and number)

Length of residence in city or town where death occurred 60 yrs. ____ mos. ____ ds. How long in U. S. if of foreign birth? ____ yrs. ____ mos. ____ ds.

2. FULL NAME Frederick J. Platt

(a) Residence: No. 161 Bridgeport Ave. St., ____ Ward Devon

(Usual place of abode) (If nonresident give city or town and State)

UNDERTAKER'S CERTIFICATE

3. SEX: male | 4. COLOR OR RACE: white | 5. SINGLE, MARRIED, WIDOWED, OR DIVORCED (write the word): married

5a. IF MARRIED OR WIDOWED, (If husband, give wife's maiden name) HUSBAND OF (OR) WIFE OF: Addie M. Platt

6. DATE OF DEATH (year, month, and day) Nov. 26, 1932

6a. DATE OF BIRTH (year, month, and day) Oct. 22, 1870

7. AGE: In Years: 62 | Months: 1 | Days: 4 | If LESS than 1 day, ____ hrs, or ____ min.

OCCUPATION

8. Trade, profession, or particular kind of work done, as spinner, lawyer, bookkeeper, etc.: Foreman, factory

9. Industry or business in which work was done, as silk mill, saw mill, bank, etc.:

10. Date deceased last worked at this occupation (month and year): ____ | 11. Total time (years) spent in this occupation: ____

12. BIRTHPLACE (city or town) Appleton

(State or country) Ohio

FATHER

13. NAME Theodore Platt

14. BIRTHPLACE (city or town) Newark

(State or country) N.J.

MOTHER

15. MAIDEN NAME Sarah Fenton

16. BIRTHPLACE (city or town) Newark

(State or country) N.J.

17. INFORMANT Mrs. F. J. Platt

(Address) Devon, Conn.

18. BURIAL, ~~CREMATION, OR REMOVAL~~ Date, Nov. 28, 1932

Cemetery Milford, Ct.

Place Milford

MEDICAL CERTIFICATE OF DEATH

19. I HEREBY CERTIFY, That I attended deceased from Feb. 22, 1932 Nov. 25, 1932

I last saw him alive on Nov. 25, 1932; death is said to have occurred on the date stated above at 12 P.M.

The principal cause of death and related causes of importance were as follows:

	Date of onset
Aneurysm arch aorta	several years
pulmonary thrombosis	

Other contributory causes of importance:

asbestosis

Name of operation ____ Date of ____

What test confirmed diagnosis? none Was there an autopsy? ____

20. If death was due to external causes (violence) fill in also the following:

Accident, suicide, or homicide? none Date of injury ____, 19__

Where did injury occur? ____ (Specify city or town, county, and State)

Specify whether injury occurred in industry, in home, or in public place.

Manner of injury none

Nature of injury ____

21. Was disease or injury in any way related to occupation of deceased? yes

If so, specify asbestos worker

Physician's Signature L. Caldwell Heidger, M.D.

(Address) 972 E Broadway Stratford, Conn.

Was Body Embalmed? Yes If so, Name of Embalmer D.L. Nettleton License No. 803

Signature of Licensed Embalmer or Licensed Undertaker D.L. Nettleton

Address Milford, Ct.

Form O.S. 15A 7-32-10M

I certify that this is a true copy of the certificate received for record.

Attest, [signature] Registrar.

Nov. 29, 1932

ADDIE M. PLATT, Widow of
FREDERICK J. PLATT, Deceased,
161 Bridgeport Avenue, Devon, Conn.
CLAIMANT

vs.

RAYBESTOS-MANHATTAN COMPANY
Bridgeport, Conn.
EMPLOYER

and

HARTFORD ACCIDENT & INDEMNITY CO.
Hartford, Connecticut,
and
THE AMERICAN SURETY COMPANY
80 John St., New York, N.Y..
RESPONDENT INSURERS

Corem

COMPENSATION COMMISSIONER

FOURTH CONGRESSIONAL DISTRICT

JUNE 20, 1933

Received ... Compensation Commissioner ... Fourth Congressional District

STIPULATION AND AGREEMENT

It is hereby stipulated and agreed between Addie M. Platt, widow of Frederick J. Platt, deceased, and formerly employed by Raybestos-Manhattan Company, and the Hartford Accident and Indemnity Company of Hartford and the American Surety Company of New York, as respondent insurers, that in consideration of a disputed claim wherein it is alleged that the death of said Frederick J. Platt was due to an occupational disease, incurred while in the employ of the said Raybestos-Manhattan Company, that a compromise settlement has been agreed upon by all parties concerned.

In accordance with this agreement, Addie M. Platt, widow of Frederick J. Platt, deceased, is to receive and the said Hartford Accident and Indemnity Company and American Surety Company are to pay in a lump sum, without discount, the total sum of
- -TWO THOUSAND FIVE HUNDRED - - - - - - - - - -and no/100 -DOLLARS ($2
in full and final settlement of any and all claims which said Addie M. Platt now has, or may in future have, against the said Raybestos-Manhatta Company for compensation, medical, surgical or hospital, or burial expense, due directly, or indirectly, to any and all known injuries, including any occupational disease, alleged to have been sustained or incurred by said Frederick J. Platt, deceased, while in the employ of Raybestos-Manhattan Company.

The claimant, i.e. Addie M. Platt, fully understands the facts as recited herein and acknowledges that the payment of
- -TWO THOUSAND FIVE HUNDRED - - -and no/100 - DOLLARS ($2500.)
in a lump sum will constitute a full, final and complete settle[illegible].

Witness James C Platt — Addie M Pla
Claimant

Hazel G Quinn — The Hartford Accident & Indemnity Co.
by [illegible]
Respondent Insurer

Lewis D. Church Jr. — The American Surety Co.
by Edward [illegible]
Respondent Insurer

The foregoing stipulation and agreement is hereby found to be fair, just, reasonable and equitable and the same is hereby approved this 20th day of June, 1933.

C. T. Buckingham

Compensation Commissioner
4th Congressional District

P. O. BOX 1035, HARTFORD, CONN.
D. R. WOODHOUSE, ATT. P. H. CORNWALL

TO Compensation Commisioner 5th Congressional Dist. DATE 5-25-33

RE-CLAIM NO.

ASSURED Raybestos -Manhattan Inc.

CLAIMANT Frederick Platt (deceased)

Dear Sir.

I find that my company The American Surety Co went on this risk on Dec.26 1930 and The Hartford Accident previous to that The Hartford Accident should by notified of this claim.

Very Truly Yours
Edward S Webster.
Edward S Webster

Copy of notice, sent to [illegible]
Hfd. Acc.

[illegible]

Notice issued May 9, 1933

Acknowledge receipt of this notice at once.

E. T. BUCKINGHAM,
Commissioner