Johns-Manville

Internal Correspondence

To: M. Barton - Denison

Date: April 30, 1981

From: M. Taber - WHQ 2-19

PLAINTIFF'S EXHIBIT JMMC-157

Copies: See below

Subject: Denison Plant Worker Cases/Employee Files

In order to assist us with the discovery process in the Denison Plant Worker cases brought to date, please have copies made of the personnel and the medical files for the following individuals who have brought suit against J-M entities as of this date:

C. Beard
James Ayres
Joe Beard
Jimmie Humphries
John Englutt, Jr.
Bobby Ritchie

This information will be produced for plaintiff's counsel in each case in the same manner as has been done in Downs and Gage. As has been previously explained, there is no Privacy Act infringement in respect to production of such materials where such are furnished to the individual employee requesting them in the litigation process.

If you should have any questions on this matter, please contact me at your earliest convenience. I would like to expedite this matter so tht our discovery can proceed apace. I look forward to visiting with you in the near future in respect to these plant worker cases.

Best regards.

cc: J. Lawrence - Denison
T. Faas - WHQ 3-07

Schyler Marshall, Esq.
Thompson & Knight
2300 Republic National Bank Building
Dallas, TX 75201

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Johns-Manville

Internal Correspondence

To: Mike Tabor, WHQ 2-19

Date: May 13, 1981

From: M. S. Burton, Denison MSB

Copies: See Below

Subject: DENISON PLANT WORKER CASES/EMPLOYEE FILES
YOUR LETTER DATED 4-30-81

We are sending under separate cover copies of the personnel files and medical files for the following:

James Ayres
Joe Beard
Jimmie Humphries
John Englutt, Jr.
Bobby Ritchie

Also, we are sending copies of the above to Schyler Marshall, Esq.

You listed C. Beard, but I believe this is in error and probably the same as Joe C. Beard.

The chest x-rays are also being mailed separately to your attention. If you need any additional information, please let me know.

MSB/is

cc:
J. A. Lawrence, Denison
T. Faas, WHQ 3-07

Schyler Marshall, Esq.
Thompson & Knight
2300 Republic National Bank Building
Dallas, TX 75201

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