

STATE OF NORTH CAROLINA
COUNTY OF WILKES

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
71 Cvs 1173

HOLLY FARMS POULTRY INDUSTRIES,
INC.,

Plaintiff,

vs.

WILBUR-ELLIS COMPANY, INTER-
NATIONAL PROTEINS CORPORATION,
EAST COAST TERMINALS, INC.,
SOUTH PACIFIC PROTEINS, INC.,
MONSANTO COMPANY, WILLIAM J.
MORAN COMPANY, JOY MANU-
FACTURING COMPANY and EMPRESA
PUBLICA DE COMERCIALIZACION DE
HARINA Y ACEITE DE PESCADO,

Defendants.

ANSWERS TO INTERROGATORIES
SERVED BY PLAINTIFF ON
OCTOBER 30, 1972

COMES NOW the defendant, Joy Manufacturing Company, and
answers under oath the interrogatories served by plaintiff on the
30th day of October, 1972, as follows:

1. Yes.

(a) July 15, 1969

(b) Sheldon S. Ellis, Esq.
Division Counsel
Western Precipitation Division
Joy Manufacturing Company
Post Office Box 2744, Terminal Annex
Los Angeles, California 90051

(c) Henry H. Hemenway

2. No.

(a) Not applicable

(b) Not applicable

(c) Not applicable

3. Yes.

(a) September 8, 1969

(b) Sheldon S. Ellis, Esq.
Division Counsel
Western Precipitation Division
Joy Manufacturing Company
Post Office Box 2744, Terminal Annex
Los Angeles, California 90051

(c) None

4. Yes.

- (a) 1. July 23, 1971
2. Undated, but received in August, 1971
3. March 6, 1972
4. March, 1972

(b) 1. Robert W. Dagenais
Process Equipment Sales Manager
Western Precipitation Division
Joy Manufacturing Company
1000 West Ninth Street
Los Angeles, California 90015

2. Letter has no addressee

3. Office of the President
Western Precipitation Division
Joy Manufacturing Company
Post Office Box 2744
Los Angeles, California 90054

4. Letter has no addressee

(c) 1. J. R. Fallon
Product Manager
Heat Transfer, Dielectrics and Process Fluid
Monsanto Company

2. J. J. Roder
Product Supervisor
Heat Transfer Fluids
Monsanto Company

3. Cumming Paton
Product Manager
Heat Transfer, Dielectrics and Process Fluid
Monsanto Industrial Chemical Co.

4. J. J. Roder
Product Supervisor
Heat Transfer Fluids
Monsanto Industrial Chemical Co.

(d) Sheldon S. Ellis, Esq.
Division Counsel
Western Precipitation Division
Joy Manufacturing Company
Post Office Box 2744, Terminal Annex
Los Angeles, California 90051

5. The requested date does not exist.

(a) Not applicable

(b) Not applicable

6. On or about October 6, 1969.

(a) Not applicable

(b) Simplicio Colinco, Jr.
Western Precipitation Division
Joy Manufacturing Company
Post Office Box 2744, Terminal Annex
Los Angeles, California 90051

7. The requested date does not exist.

(a) Not applicable

(b) Not applicable

8. On or about July 6, 1970

(a) Not applicable

(b) Lynn Lindhurst
Present address unknown

9. Approximately November 23, 1969

10. Thomas Yousch
3845 Sherbrooke
Santa Rosa, California

11. Simplicio Colinco, Jr.
Western Precipitation Division
Joy Manufacturing Company
Post Office Box 2744, Terminal Annex
Los Angeles, California 90051

Ojars Lasmanis
Western Precipitation Division
Joy Manufacturing Company
Post Office Box 2744, Terminal Annex
Los Angeles, California 90051

Lynn Lindhurst
(Address unknown)

Clifford E. Shewcheck
5343 West Wrightwood
Chicago, Illinois 60039

George W. Taylor, Jr.
Western Precipitation Division
Joy Manufacturing Company
Post Office Box 2744, Terminal Annex
Los Angeles, California 90051

Thomas Yousch
3845 Sherbrooke
Santa Rosa, California

Murray I. Singer
1966 East 93rd Street
Cleveland, Ohio

12. No.

- (a) Not applicable
- (b) Not applicable
- (c) Not applicable
- (d) Not applicable.
 - (i) Not applicable
 - (ii) Not applicable

13. Yes.

- (a) Lewis J. Samuels - periodically 1967-1969
9171 Wilshire Boulevard
Beverly Hills, California

Robert W. Dagenais - periodically 1969-1971
312 East Crystal View Avenue
Orange, California

Murray I. Singer - periodically 1970-1971
1966 East 93rd Street
Cleveland, Ohio

Thomas Yousch - periodically 1967-1971
3845 Sherbrooke
Santa Rosa, California

- (b) Messrs. Samuels, Dagenais and Yousch spoke
with Mr. Jerry Davidson; Mr. Singer spoke
with Mr. Jay Pullman.

14. Yes.

- (a) Answered in Response 13 (a) and (b) above

15. Process Equipment Coordinator - performed liaison ser-

...vices to coordinate the activities of Western Precipitation's Engineering and Sales Departments; also performed routine technical and administrative activities.

16. Assistant to Process Equipment Sales Manager - performing sizing calculations for equipment applications; routine correspondence; coordination between Western Precipitation's Research and Engineering Departments.

17. Sales Engineer - selling process equipment in assigned territory.

18. Whether or not any of the facilities referred to in said interrogatory currently use the mentioned heat exchange medium is unknown.

19. See Exhibit A attached.

20.

Drawing Number	Rev. No.	Title
P-64472-B	6	Bearing Assembly
P-135769-A	1	Steam Cleaning System for D2424 H.F. Processor Cool
P-136410-B	4	Gen. Arr. Past. Equipment
P-136411-A	1	D2424-6 Gen. Arr. G.E.D.
P-136412-B	0	Machinery Assembly (D24)
P/L-136413-L	1	Gen. Arr. Name Plate & Part List
P-136414-A	2	D2424-6 Gen. Arr. D.E.D.
P/L-136415-L	0	D2424-6 Gen. Name Plate Da
P-136416-A	1	D2824-12 Gen. Arr. D.E.D.
P-136417-B	0	Machinery Assembly (D28)
P/L-136418-L	0	D2824-12 Gen. Name Plate D
P-136419-B	0	D2824-12 Drive Arr.
P-136420-B	0	D24-Drive Arr.
P-136427-B	0	Shaft Seal Assembly
P-136430-A	2	Support Steel Structure
P-136436-A	3	D2424-6 Gen. Arr. G.E.D.
P/L-136437-L	0	D2424-6 Gen. Name Plate Da
H-136442-B	2	Connecting Ducts
P-136483-B	0	Support Steel Det. Modif.

21. Arnold Anderson & Assoc.
338 North Azusa Avenue
West Covina, California 91790

Baker Engineering Company
357 South Anderson Street
Los Angeles, California 90033

Berlin-Chapman Company
Berlin
Wisconsin

Cadillac Plastic
2305 West Beverly Boulevard
Los Angeles, California 90057

East Coast Terminals, Inc.
U. S. Highway 421 North
Wilmington, North Carolina

Empresa Publica de Comercializacion
de Harina y Aceite de Pescado
Lima, Peru

Food & Drug Administration
Department of Health, Education
and Welfare
Washington, D. C.

Guy L. Warden & Sons, Inc.
5261 East Washington Boulevard
Los Angeles, California 90016

Hewitt-Robbins, Inc.
Whitney Chain Division
237 Hamilton Street
Hartford, Connecticut 06102

Johnson Corporation
805 Wood Street
Three Rivers, Michigan 49093

Joy Manufacturing Company
Western Precipitation Division
Post Office Box 2744, Terminal Annex
Los Angeles, California 90051

Koppel Bulk Terminal Company
Post Office Box 2330
Long Beach, California 90801

Litco, Inc.
Maple & Tamarac Road
Carpentersville, Illinois 60110

Mark Costello Company
1417 Georgia Street
Los Angeles, California 90015

Martin Sprocket & Gear, Inc.
Post Office Box 88
Scottdale, Georgia 30079

Mechanical Drives
5400 Pacific Boulevard
Huntington Park, California 90255

Monsanto Company
800 Lindbergh Boulevard
St. Louis, Missouri 63166

Moore's Fabricators & Erectors, Inc.
Post Office Box 937
Wilmington, North Carolina 28401

Sid E. Parker Boiler Mfg. Co.
2035 East 37th Street
Los Angeles, California 90058

South Pacific Proteins, Inc.
10 Corbin Drive
Darien, Connecticut 06820

Charles D. Burges
10 Corbin Drive
Darien, Connecticut 06820

U. S. Motors Division
Emerson Electric Company
Post Office Box 2058
Los Angeles, California 90058

William J. Moran Company
1011 South Fremont
Alhambra, California

Also various officers, directors,
employees and agents of the above
listed - the names and addresses
of such are not entirely known to
this defendant

See also names listed in Answer to
Interrogatories Number 11 and 13

22. Joy Manufacturing Company, Western Precipitation Division, relied upon the written recommendations set forth in various technical publications of Monsanto Company, together with oral recommendations by the local Monsanto Sales Representative.

(a) Jerry Davidson - various dates in 1968 -
1969 on a routine, frequent basis

23. July 17, 1969	\$ 35,000.00
November 3, 1969	\$ 79,000.00
April 2, 1971	\$ 1,976.46

Western Precipitation Division
Joy Manufacturing Company

By: 

H. C. Cozza
Group Vice-President and
General Manager

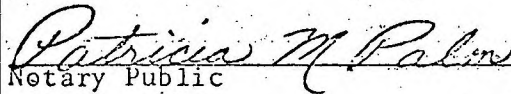
STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

First being duly sworn, H. C. COZZA says:

That he is the Group Vice-President and General Manager of Western Precipitation Division of Joy Manufacturing Company; that he is authorized to furnish the foregoing Answers to Interrogatories on behalf of Joy Manufacturing Company; that he has read the foregoing Answers to Interrogatories and knows the contents thereof; and that, to the best of his knowledge, information and belief, the information stated therein is true.


H. C. Cozza

SWORN TO and subscribed before me,
this 16th day of February, 1973.


Notary Public

My Commission Expires: 11/17/75



EXHIBIT A

Corn Products Refining	Argo, Illinois
Pillsbury Mills, Inc.	Minneapolis, Minnesota
Moly Corporation	Mountain Pass, California
Abbott Laboratories	N. Chicago, Illinois
General Mills, Inc.	Belmond, Iowa
General Chemical Division,	Marcus Hook, Pennsylvania
W. J. Wrigley Company	Chicago, Illinois
National Gypsum Company	Buffalo, New York
General Mills, Inc.	Lodi, California
C. K. Williams & Company	Easton, Pennsylvania
Westvaco Chemical Division	Layrence, Kansas
Calgon, Inc.	Rockwood, Michigan
General Chemical Division	Buffalo, New York
Carnation Company (Albers)	Ogden, Utah
Corn Products Refining	Pekin, Illinois
National Gypsum	Shoals, Indiana
Western Cartridge Company	Belgium
C. K. Williams & Company	Lehigh Gap, Pennsylvania
General Chemical Division	Chicago, Illinois
International Nickel Company	Mond, Wales
Stauffer Cowles	Lake Worth, Florida
Stauffer Chemical	Southgate, California
Central Labs (General Foods)	La Salle, Connecticut
Carnation Company	Van Nuys, California
Barrett Division Allied Chemical	Toledo, Ohio
Solvay Process Division, Allied Chemical	Syracuse, New York
T. W. MacKay & Son (B.C. Fruit Processors)	Kelowna, B. C.
Phillips Petroleum Company	Borger, Texas

Clinton Foods, Inc.	Clinton, Iowa
International Nickel of Canada	Copper Cliff, Ontario
Catalytic Construction Company	Oak Ridge, Tennessee
Monsanto Chemical Company	St. Louis, Missouri
Pepsico	Long Island, New York
Heyden Chemical Corporation	Garfield, New Jersey
C. Pfizer	E. St. Louis, Illinois
Bunker Hill Mining Company	Kellogg, Idaho
P. P. & G.	Natrium, West Virginia
Victor Chemical Company	Chicago Heights, Illinois
Nickel Processing Company	Nicar, Cuba
Esso Res.	New Jersey
Tizon Chemical	New Jersey
National Gypsum Company	Bronx, New York
Cabot Titanium	Astabula, Ohio
Am. Potash & Chemical	Trona, California
AEC	Oak Ridge, Tennessee
Southern Clays, Inc.	Gordon, Georgia
Dow Chemical Company	Midland, Michigan
Hershey Chocolate Corporation	Hershey, Pennsylvania
General Foods R & D	Battle Creek, Michigan
Precipco Test Unit	Montreal, Canada
Imperial Chemical Industries (African Explosives & Chemical Industries, Ltd.)	Transvaal, Africa
Diamond Alkalai Company	Kearney, New Jersey
National Gypsum Company	National City, Michigan
Inglehart Bros. Div. Gen. Foods	Evansville, Indiana
General Mills, Ltd.	Weston, Toronto, Ontario
Hill Bros. Company	Brooklyn, New York
Canada & Dominion Sugar	Montreal, Canada
Nebraska Cons. Mills Company	Omaha, Nebraska

American Cyanamid Company	Wallingford, Connecticut
CuZn	San Luis Obispo, California
National Gypsum Company	Westwego, Louisiana
C&H Sugar Refining Corporation	Crockett, California
National Gypsum Company	Burlington, New Jersey
International Waxes, Ltd.	Agincourt, Ontario
Archer-Daniels-Midland	Mankato, Minnesota
International Nickel of Canada	Port Colbourne, Ontario
Canada Linseed Oil Mills	Toronto, Ontario
Hooker Electrochemical	Niagara Falls, New York
Shawinigan Chemicals, Ltd.	Shainigan Falls, Oregon
Canada Linseed Oil Mills	Montreal, Quebec
St. Lawrence Sugar Refining Ltd.	Montreal, Quebec
Olin Chemical Company	Joliet, Illinois
Aluminum Company of Canada	Arvida, Quebec
Corn Products Refining	Corpus Christi, Texas
Western Electric Company	Chicago, Illinois
Callery Chemical Company	Callery, Pennsylvania
Western Electric Company	Haverhill, Massachusetts
Cleveland Cliffs Mining	Ishpeming, Michigan
Supreme Sugar Refining	Supreme, Louisiana
Kellogg	England
B. C. Fruit Processors	Kelowna, B. C.
Eldorado Nuclear Uranium Company	Saskatchewan, Canada
Blaw-Knox Chemical Plants, Inc.	Copper Cliff, Ontario
Barrett Division	Ironton, Ohio
Wepreco Test Units	Los Angeles, California
Columbia-Southern Chemical	Corpus Christi, Texas
Atlantic Gelatin, Gen. Foods	Dover, Delaware
Lever Bros. Company	Baltimore, Maryland

Canadian Industries, Ltd.

Ash Grove Lime & Portland Cement

Kellogg Company

Kaiser Aluminum & Chemical

Basic, Inc.

Beryllium Corporation

Aluminum Company of Canada

Northern Electric Company

National Gypsum Company

National Gypsum Company

Olin-Mathieson Chemical

La Luz Mines, Ltd.

Monsanto Chemical Company

Proctor & Gamble Company

Canada, & Dominion Sugar

Refined Syrups & Sugars

Eli Lilly & Company

Canadian Industries, Ltd.

Diamond Shamrock Company

Solvay Process Division

Monsanto Chemical Company

Stauffer Chemical

Union Carbide Chemical

Tom's River Cinn. Chem.

Buckman's Labs., Inc.

Kellogg Company

Kellogg Company

Pacific Adhesives Company

American Molasses Company

Colonial Sugar Company

Beloeil, Quebec

Springfield, Missouri

Battle Creek, Michigan

Ravenswood, West Virginia

Fostoria, Ohio

Ashmore, Pennsylvania

Kitimat, B. C.

Montreal, Quebec

Lorain, Ohio

Waukegan, Illinois

Hannibal, Ohio

Nicaragua

Soda Springs, Idaho

Ivorydale, Ohio

Toronto, Ontario

Yonkers, New York

Indianapolis, Indiana

Nobel, Ontario

Deer Park, Texas

Syracuse, New York

Monsanto, Illinois

Skaneateles Falls, N. Y.

Institute, West Virginia

Tom's River, New Jersey

Memphis, Tennessee

Memphis, Tennessee

Omaha, Nebraska

Hillsboro, Oregon

Brooklyn, New York

Gramercy, Louisiana

Manganese Chemical Company	Riverton, Minnesota
Dominion Rubber Company, Ltd.	Montreal, Quebec
Diamond Shamrock [REDACTED]	Painesville, Ohio
American Agri. Chem. Co. [REDACTED]	Carteret, New Jersey
National Gypsum Company	Lorraine, Ohio
Am. Cyanamid Company [REDACTED]	Bound Brook, New Jersey
Phillips Petroleum Company	Bartlesville, Oklahoma
Canadian British Aluminum	Montreal, Quebec
Westvaco Mineral Prod. Div.	Lawrence, Kansas
F. M. C.	Newark, California
Pelican State Lime	Morgan City, Louisiana
Puerto Rican American Sugar Refining Company	Mercedita, Puerto Rico
Stauffer	Chicago, Illinois
Vy-Lactos Labs	Des Moines, Iowa
Pennsylvania Sugar Div.	Philadelphia, Pennsylvania
Homestake Mining Company	Grants, New Mexico
Litwin (Wareick Wax)	(Chanute, Kansas
Stauffer Chemical [REDACTED]	Morrisville, Pennsylvania
Tennessee Eastman Company	Kingsport, Tennessee
Dow Chemical of Canada, Ltd.	Sarnia, Ontario
International Nickel Co. of Canada	Thompson, Manitoba
Pittsburgh Plate Glass [REDACTED]	Pittsburgh, Pennsylvania
Blaw-Knox Company [REDACTED]	Carteret, New Jersey
Walter Baker Division Gen. Foods	Dorchester, Massachusetts
Activated Metals	Sevierville, Tennessee
Phillips Chemical Company	Phillips, Texas
Bechtel Corp. for Dow Chemical	Torrance, California
[REDACTED] Naugatuck Chem. Div. of U. S. Rubber Company	Naugatuck, Connecticut
Kaiser Engineers for Hindustan Aluminum Corporation	Rihand, India

Olin-Mathieson Chemical	Niagara Falls, New York
Dow Chemical	Vancouver, B. C.
Sprout-Waldron & Company, Inc. for Heiners Bakery	Huntington, West Virginia
Hollinger Hanna Company for Iron Ore Company of Canada	Schefferville, Quebec
Malinkrodt Chemical Company	St. Louis, Missouri
Gas Processors, Inc. [REDACTED]	Brea, California
Scientific Design for Witco Chemical Company [REDACTED]	Perth Amboy, New Jersey
Fluor Corp. Ltd. for Chem. Co.	E. Baton Rouge, Louisiana
Bechtel Corp. for <u>Napco</u> Chem.	Linden, New Jersey
Kellogg Company	Sydney, Australia
Kellogg Company	London, Ontario
Cowles Chemical (Stauffer)	Joliet, Illinois
Marathon Chemical	Gary, Indiana
American Cyanamid [REDACTED]	Fort Worth, Texas
Western Precipitation [REDACTED]	Los Angeles, California
Industria del Alkali	Monterrey, Mexico
Delco Remy [REDACTED]	Muncie, Indiana
Delco Remy	Anaheim, California
Delco Remy	Olathe, Kansas
Delco Remy	New Brunswick, New Jersey
California Hawaiian Sugar	Crockett, California
General Foods	LaSalle, Quebec
Stauffer Chemical (Cowles)	Pittsburg, California
Chemstrand [REDACTED]	Gonzalez, Florida
<u>Monsanto</u> [REDACTED]	Long Beach, California
Dow Chemical [REDACTED]	Cleveland, Ohio
Vanderbilt	Bethel, Connecticut
Intalco Aluminum [REDACTED]	Intalco, Washington
Glidden Company	Hammond, Indiana

Mongo Scott

General Foods

National Lead

Fiber Industries

Reynolds Metals

Stauffer

W. J. Strange

Ensuido

Interpace Ione

American Cyanamid

Monsanto

Climax Molybdenum

Kaiser Aluminum & Chemical

Marathon Oil

Stanford Creamery

Central Soya

Colorado S.M.R.F.

Red Mountain Mines

National Analine

American Cyanamid

Monsanto Company

B. C. Molybdenum

Celanese Corporation

Charles Pfizer

Wausau Paper Mills

Glyco Chemical

Calgon

American Snuff

SuCrest Corporation

General Foods

Australia

Coburg, Ontario

Sayreville, New Jersey

Shelby, North Carolina

Grottoes, Virginia

Mt. Pleasant, Tennessee

Chicago, Illinois

Japan

California

Linden, New Jersey

Des Moines, Iowa

Climax, Colorado

Mead, Washington

Detroit, Michigan

Stanford, Kentucky

Chicago, Illinois

Golden, Colorado

Rossland, B. C.

Hopewell, Virginia

Willow Island, W. Va.

Anniston, Alabama

Alice Arm, B. C.

Bay City, Texas

Groton, Connecticut

Brokaw, Wisconsin

Williamsport, Pennsylvania

Morrisville, Pennsylvania

Clarksville, Tennessee

Bronx, New York

Banbury, England

Thiele Kaolin [REDACTED]

Fiber Industries [REDACTED]

Sophie Mae Candy [REDACTED]

Circus Foods [REDACTED]

International Pipe & Ceramics [REDACTED]

Olin Mathieson Chemical [REDACTED]

Molybdenum Corporation [REDACTED]

Millhaven Fibres, Ltd. [REDACTED]

Urad Mine D.V. Climax Moly. [REDACTED]

Wescor Corporation [REDACTED]

Minnesota Mining and Manufacturing [REDACTED]

Reactive Metals [REDACTED]

Stauffer Chemicals [REDACTED]

Ingleheart Div. G. M. [REDACTED]

Central Mercedita [REDACTED]

Vison Plastics [REDACTED]

Territory Enterprises [REDACTED]

Central Soya, Inc. [REDACTED]

A.C. Spark Plug Div. G.M. [REDACTED]

Montecatina Edison [REDACTED]

Miles Labs [REDACTED]

Alcoa [REDACTED]

Stone Container Corporation [REDACTED]

A. E. Staley Mfg. Co. [REDACTED]

E. I. du Pont [REDACTED]

Nestle Company [REDACTED]

Diamond Alkali [REDACTED]

Maumee Chemical [REDACTED]

Titanium Metals [REDACTED]

Union Carbide [REDACTED]

Sandersville, Georgia

Salisbury, North Carolina

Atlanta, Georgia

San Francisco, California

Ione, California

Pisgah Forest, N. C.

Questa, New Mexico

Kingston, Ontario

Golden, Colorado

Hawesville, Kentucky

St. Paul, Minnesota

Ashtabula, Ohio

Louisville, Kentucky

Mercedita, Puerto Rico

Mercedita, Puerto Rico

Florence, Massachusetts

Darwin, Australia

Decatur, Indiana

Flint, Michigan

Sicily, Italy

Elkhart, Indiana

Bauxite, Arkansas

Coshocton, Ohio

Decatur, Illinois

Vee, Ohio

Granite City, Illinois

Painesville, Ohio

Cincinnati, Ohio

Henderson, Nevada

S. Charleston, W. Va.

[REDACTED] Monsanto [REDACTED]

Canadian Titanium Pigments

Diamond Alkali

Diamond Shamrock

Phillips

Nabisco

C. Itoh

Velsicol Chemical [REDACTED]

Interpace [REDACTED]

Duval Corporation [REDACTED]

Southwire Corporation [REDACTED]

Cabot Titania [REDACTED]

Farmers Chemical Corporation

Asahi Chemical

E. I. du Pont

Koppel Bulk Terminal [REDACTED]

E. I. du Pont

Stauffer Chemical

Vulcan Materials

Eastalco Aluminum [REDACTED]

Gulf Coast Aluminum [REDACTED]

Wellman-Lord

Noranda Aluminum [REDACTED]

Rexall

Olin Mathieson

Industrias Cottlan

Ecology [REDACTED]

FMC [REDACTED]

Barkoid Division, National Lead [REDACTED]

B. F. Goodrich

Chocolate Bayou, Texas

Varenes, Quebec

Delaware City, Delaware

Houston, Texas

Pasadena, Texas

Naperville, Illinois

Japan

Memphis, Tennessee

Mankato, Kansas

Sahuarita, Arizona

Hawesville, Kentucky

Ashtabula, Ohio

Tunis, North Carolina

Japan

Deepwater, New Jersey

Stockton, California

Washington, Virginia

Nashville, Tennessee

Wichita, Kansas

Buckeystown, Maryland

Louisiana

Lakeland, Florida

New Madrid, Missouri

Odessa, Texas

Joliet, Illinois

Mexico

Brooklyn, New York

Princeton, New Jersey

Houston, Texas

Buckeyville, Ohio

Continental Carbon	Phoenix City, Alabama
Hazen Research	Golden, Colorado
East Coast Terminals, South	Wilmington, North Carolina
Pacific Proteins	Stamford, Connecticut
Crawford Russell	Canon City, Colorado
Cotter Corporation	Tampa, Florida
Gulf Design -	County Galway, Ireland
Irish Base Metals	Chicago, Illinois
Nalco Chemical	Malvern, Arkansas
Reynolds Metals	Deepwater, Texas
E. I. du Pont	Sydney, Australia
Balm Paint	Columbus, Mississippi
Hooker Chemical	Bluff, New Zealand
N. Z. Aluminum	Shirley Basin, Wyoming
Utah Construction & Mining	Odessa, Texas
Rexene Polymer	Palabora, South Africa
Palabora Mines	Bow, New Hampshire
Humphries Corporation	Pisgah Forest, N. C.
Ecusta Paper - Olin	Dallas , Washington
Harvey Aluminum	Goose Pond, Atla.
Revere Copper (Lurgi)	Richland, Washington
Jersey Nuclear	Bethlehem, Pennsylvania
Keystone Chemurgic.	Tuscon, Arizona
Pima Mining	Eugene, Oregon
Cascade Fiber	Vancouver Island
Island Copper	Ironton, Ohio
Selas Corporation for Dow	Freeport, Texas
Dow Chemical	Jonesboro, Tennessee
Tennessee Nuclear	Loch Mond, Nova Scotia
Kaiser Chemical	New York, New York
American Lurgi Corporation	

Olin Corporation	Stamford, Connecticut
Stackpole Carbon Company	St. Mary's, Pennsylvania
Penn Packing Company	Philadelphia, Pennsylvania
Clermont Engr. Co. for Philadelphia Quartz	Butler, New Jersey
Crete Mills	Crete, Nebraska
Diosynth	Mexico City, Mexico
Stauffer Chemical	Richmond, California
Union Carbide Corporation	Marietta, Ohio
Duval Sierrita Corporation	Esperanza, Arizona
Mallinckrodt Chemical Company	St. Louis, Missouri
Gibraltar Mines	Vancouver, B.C., Canada
Landon Company	Delavan, Wisconsin
Ocean Spray	Chicago, Illinois
Vulcan Chemical Company	Wichita, Kansas
General Chemical Division	Chicago, Illinois
Victor Chemical Company	Nashville, Tennessee
National Biscuit Company	Chicago, Illinois
National Carbon Company	Fostoria, Illinois
Monsanto Chemical Company	El Dorado, Arkansas
U. S. Dept. of Agriculture	Morgantown, West Virginia
Diamond Alkali Company	Jersey City, New Jersey
Wm. Wrigley Co., Ltd.	Toronto, Ontario, Canada
Olin Mathieson Chemical	Charleston, Tennessee
W. R. Grace (Davidson)	Wayne, New Jersey
Climax Molybdenum	Langeloth, Pennsylvania
Cyanamid of Canada	Niagara Falls, Ontario
Pennsalt Chemical Company	Wyandotte, Michigan
Stauffer Chemical	Southgate, California
Union Carbide	Fostoria, Ohio
Diamond Alkali Company	Dallas, Texas

National Gypsum	Richmond, California
Cia Salitrera Anglo Lantaro	Toeopilla, Chile
Xylos Rubber Company	Akron, Ohio
Container Corporation of America	Circleville, Ohio
Union Carbide Chemical Company	Port Lavaca, Texas
Mobil Chemical	Cincinnati, Ohio
Lauhoff Grain Company	Danville, Illinois
Container Corporation of America	Carthage, Indiana
Rohm & Haas Company	Philadelphia, Pennsylvania
American Smelting and Refining	Mission, Arizona
General Aniline & Film Corporation	Grasselli, New Jersey
Armour and Company	Springfield, Kentucky
Dominion Rubber Company	Montreal East, Quebec
Borden Food Company	Arcade, New York
Trojan Powder Company	Springville, Utah
National Gypsum	Long Beach, California
General Foods	Kankakee, Illinois
Kitchens of Sara Lee	Chicago, Illinois
Raychen	Palo Alto, California
Celanese Plastics Company	Deer Park, Texas
Enekoosa Edwards Paper Company	Port Edwards, Wisconsin
Kitchens of Sara Lee	Deerfield, Illinois
Ott Chemical	Muskegon, Michigan
Mallinckrodt Chemical Company	St. Louis, Missouri
Arthur G. McKee & Company	Independence, Ohio
Koppers Company, Inc.	Pittsburgh, Pennsylvania
First National Leasing Company	Milwaukee, Wisconsin
Joy Manufacturing Company	Johannesburg, S. Africa
Hoffman Taft, Inc.	Springfield, Mississippi
Kennecott Copper	Hurley, New Mexico

Pittsburgh Plate Glass

Monsanto Chemical Company

National Gypsum

Vasco-A Teledyne Company

Hooker Chemical Corporation

Compounding Corporation of America

Dorr-Oliver, Inc.

Hooker Chemical Corporation

Stauffer Chemical Company

Government of Indonesia

Union Carbide

Rumianca, S. P. A.

General Electric Company

Economics Lab, Inc.

Essex Chemical Company

Essex Chemical Company

Certain-teed Prod. Corp.

Certain-teed Prod. Corp.

Blaw-Knox Company

Corpus Christi, Texas

Texas City, Texas

Tampa, Florida

Latrobe, Pennsylvania

Tacoma, Washington

Schnectady, New York

Stamford, Connecticut

Niagara Falls, New York

Compton, California

Indonesia

Seadrift, Texas

Torina, Italy

Waterford, New York

St. Paul, Minnesota

Sayreville, New Jersey

Clifton, New Jersey

Tacoma, Washington

Valley Forge, Pennsylvania

Pittsburgh, Pennsylvania

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Answers to Interrogatories Served by Plaintiff on October 30, 1972, was served on counsel for the parties by depositing a copy of the same in an official depository of the United States Mail, in a postage-paid envelope, addressed according to the attached list.

This the 22nd day of February, 1973.


Richard T. Feerick

Mr. William H. McElwee
Mr. Turner V. A. Adams
McELWEE AND HALL
906 B Street Rear
North Wilkesboro, N. C. 28659

Mr. Welch Jordan
Mr. Edward L. Murrelle
JORDAN, WRIGHT, NICHOLS,
CAFFREY & HILL
Post Office Box 989
Greensboro, N. C. 27402

Attorneys for Plaintiff, Holly Farms Poultry Industries, Inc.

Mr. Kyle Hayes
HAYES & HAYES
Post Office Box 64
North Wilkesboro, N. C. 28659

Mr. John G. Golding
CARPENTER, GOLDING, CREWS &
MEEKINS
806 East Trade Street
Charlotte, N. C. 28202

Attorneys for Defendant, Wilbur-Ellis Company

Mr. Herbert Rand
KANE, KESSLER, PREISS, RAND &
PROUJANSKY
60 Wall Street
New York, New York 10005

Mr. Ralph M. Stockton, Jr.
Mr. Robert Elster
HUDSON, PETREE, STOCKTON,
STOCKTON & ROBINSON
Post Office Box 2860
Winston-Salem, N. C. 27102

Attorneys for Defendant, International Proteins Corporation

Mr. Alan A. Marshall
MARSHALL, WILLIAMS, GORHAM &
BRAWLEY
Post Office Box 1013
Wilmington, N. C. 28401

Mr. John M. Minor
Mr. Fred S. Hutchins, Jr.
DEAL, HUTCHINS & MINOR
Post Office Box 1406
Winston-Salem, N. C. 27101

Attorneys for Defendant, East Coast Terminals, Inc.

Mr. James J. Higgins
KERLIN, CAMPBELL & KEATING
120 Broadway
New York, New York 10005

Mr. Charles F. Vance, Jr.
Mr. Jimmy H. Barnhill
WOMBLE, CARLYLE, SANDRIDGE & RICE
Post Office Drawer 84
Winston-Salem, N. C. 27102

Attorneys for Defendant, South Pacific Proteins, Inc.

Mr. McNeill Smith
Mr. David M. Moore, II
SMITH, MOORE, SMITH, SCHELL &
HUNTER
Post Office Drawer G
Greensboro, N. C. 27402

Mr. Larry S. Moore
MOORE & ROUSSEAU
Moore & Rousseau Building
311 Ninth Street
North Wilkesboro, N. C. 28659

Attorneys for Defendant, Monsanto Company

Mr. Charles T. Hagan, Jr.
Mr. Clinton Eudy, Jr.
ADAMS, KLEEMEIER, HAGAN, HANNAH
& FOUTS
Post Office Box 3463
Greensboro, N. C. 27402

Mr. Perry C. Henson
Post Office Box 2288
Greensboro, N. C. 27402

Attorneys for Defendant, William J. Moran Company

Mr. Roy G. Hall, Jr.
HATFIELD, ALLMAN AND HALL
Post Office Drawer 593
Winston-Salem, N. C. 27102

Mr. Edward J. Ross
Mr. James D. Zirin
BREED, ABBOTT & MORGAN
55th Floor
1 Chase Manhattan Plaza
New York, New York 10005

Attorneys for Defendant, EPCHAP