NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

EXHIBIT
GF-713B

To all to whom these presents shall come. Greeting:

By virtue of the authority vested in me by the Archivist of the United States, I certify on his behalf, under the seal of the National Archives and Records Administration, that the attached reproduction(s) is a true and correct copy of documents in his custody.

SIGNATURE: Twila Ridgeway

NAME: for KENT C. CARTER

DATE: 9-22-98

TITLE: Regional Director

NAME AND ADDRESS OF DEPOSITORY

Office of Regional Records Services
Southwest Region
501 W. Felix St., Bldg. 1
Fort Worth, TX 76115

[illegible]-387-782/03529

NA FORM 13040 (10-86)

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

FILED
M. Sept. 17
James R. Cooney, ... 1969
By Myra Barton
DEPUTY

S. R. POTTER :

VS. : CIVIL NO. 6329

FIBREBOARD PAPER PRODUCTS :
CORPORATION ET AL :

INTERROGATORIES PROPOUNDED TO DEFENDANT
RUBEROID COMPANY

TO: Defendant Ruberoid Company and/or its attorneys of Record, Barnes & Barnes, P. O. Box 5098, Beaumont, Texas:

S. R. POTTER, plaintiff, hereby serves upon the above named defendant the following written interrogatories to be answered fully and fairly in writing under oath, which shall be signed by the person or persons making such answers, a copy of such answers to be served upon plaintiff's attorney within fifteen (15) days after service herein, in accordance with Rule 33 of the Federal Rules of Civil Procedure:

(1) Please give the correct name and address of your company, and the name and address of the agent for service in Texas.

(2) Is your company a corporation, partnership, or individual proprietorship, and if it is not, what type of entity is your company?

(3) If your company is a partnership, list the names and addresses of all partners.

(4) If your company is an individual proprietorship, please list the name and address of such person.

STEPHENSON AND THOMPSON

By [signature]
Attorneys for Plaintiff
Stephenson Building
Orange, Texas 77630

CERTIFICATE OF SERVICE BY MAIL

I, Ward Stephenson, hereby certify that a true and correct copy of the foregoing instrument was on this the 16th day of September, 1969, mailed to Barnes & Barnes, P. O. Box 5098, Beaumont, Texas, attorneys for Ruberoid Company, by certified mail, return receipt requested.

Ward Stephenson

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

FILED
SEP 30 1969
M ____ 19____
James R. Cooney, Clerk, U. S. Court
By _____ DEPUTY

S. R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.

CIVIL ACTION NO. 6329.

REPLIES TO INTERROGATORIES PROPOUNDED TO DEFENDANT RUBEROID COMPANY

1. Ruberoid Company, a division of GAF. The undersigned attorney will accept service of process.

2. A division of a corporation.

3. No answer required.

4. No answer required.

Robert E. Barnes.

Sworn to and subscribed before me the undersigned authority on this the 29th day of September, 1969.

Beatrice L. Engel
Notary Public in and for
Jefferson County, Texas.

Respectfully submitted,

BARNES & BARNES

BY Robert E. Barnes

2315 Calder - P. O. Box 5098,
Beaumont, Texas,
Telephone 833-8601,
Attorneys for the Defendant.

CERTIFICATE OF SERVICE

I certify that a copy of the above and foregoing has been served upon counsel for the Plaintiff by depositing the same in the United States Mail addressed to Mr. Ward Stephenson, Stephenson Building, P.O. Box 68, Orange, Texas, 77630, on the 29th day of September, 1969.

Robert E. Barnes.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MAR 13 1970
JAMES R. COONEY, CLERK
BY
DEPUTY

SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.

CIVIL ACTION NO. 6329.

DEFENDANT RUBEROID COMPANY'S
SUPPLEMENTARY REPLIES TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES

COMES NOW Ruberoid Company, one of the Defendants in the above styled and numbered cause, and makes and files this its SUPPLEMENTARY REPLIES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES, respectfully representing the following:

INTERROGATORY NO. 11:

This Defendant has no information or independent knowledge of the matters referred to or inquired about in said Interrogatory. This Defendant is generally aware of the report made the subject matter of said Interrogatory, but does not recognize this report as applicable to the use of asbestos products by construction workers engaged in installing such products who are exposed only some of the time to asbestos dust and then to dust counts which should be below the threshold limit values published by the American Conference of Governmental Industrial Hygienists.

INTERROGATORY NO. 12:

This Defendant has no information or independent knowledge of the matters referred to or inquired about in said Interrogatory. This Defendant is generally aware of the report made the subject matter of said Interrogatory, but does not recognize this report as applicable to the use of asbestos products by construction workers engaged in installing such products who are exposed

only some of the time to asbestos dust and then to dust counts which should be below the threshold limit values published by the American Conference of Governmental Industrial Hygienists.

INTERROGATORY NO. 13:

This Defendant has no information or independent knowledge of the matters referred to in said Interrogatory, but it is aware at this time of this legislative history. This legislation related to workers in asbestos-textile factories, where dust was extremely heavy and consisted of a 100% asbestos fibers and where exposure was continuous. There is no reason for a correlation of this legislation with the use of asbestos products by insulation workers who are exposed only part of the time to asbestos fiber dust and even then to counts which should be below the threshold limit values published by the American Conference of Governmental Industrial Hygienists.

INTERROGATORY NO. 17:

This Defendant does not know whether or not or by whom asbestos may have been directly associated medically with the disease of cor pulmonale.

INTERROGATORY NO. 26:

This Defendant does not agree that construction workers other than asbestos insulators share the same exposure to asbestos dust.

INTERROGATORY NO. 28:

No.

INTERROGATORY NO. 37:

Assuming the truth of such a statement, which this Defendant does not admit to be true but says is not true, the answer to said Interrogatory is Yes. By way of explanation, see this Defendant's answer to Interrogatory No. 18.

INTERROGATORIES NO. 47-84:

Although this Defendant does not have independent knowledge of the contents of the workmen's compensation laws of all of the states, it does have

knowledge as to content of the laws of some states. As to the states whose workmen's compensation laws are within the knowledge of this Defendant, it recognizes that such compensation laws do cover asbestosis. However, this Defendant understands that under the law of some states, occupational disease is specifically recognized, but its identification as asbestosis would be a matter of interpretation to be made by some Industrial Accident Board or some Court. Other states specifically list asbestosis as an occupational disease. Other than by making a complete study of the workmen's compensation statutes of all of the states inquired about in Interrogatories No. 47 through 84, this Defendant cannot predicate a sworn statement in reply to said Interrogatories except as hereinabove indicated.

Robert E. Barnes.

Sworn to and subscribed before me, the undersigned authority, on this the 13th day of March, 1970.

Notary Public in and for
Jefferson County, Texas.

Respectfully submitted,

BARNES & BARNES

BY

2315 Calder - P. O. Box 5098,
Beaumont, Texas,
Telephone 833-8601,
Attorneys for Ruberoid Company.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon Mr. Ward Stephenson, Stephenson Building, Orange, Texas, Attorney for Plaintiff, by mailing the same to his address on the 13th day of March, 1970, and a copy was served on each and all other counsel of record by depositing the same in the United States mail properly addressed, with postage paid, on the 13th day of March, 1970.

Robert E. Barnes.

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
DEC 25 1969
Jam... U.S. Dist.
By ... DEPUTY

SAMUEL R. POTTER	
VS.	
FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.	CIVIL ACTION NO. 6329.

ANSWERS OF THE DEFENDANT
RUBEROID COMPANY TO
INTERROGATORIES PROPOUNDED BY PLAINTIFF

TO THE PLAINTIFF, SAMUEL R. POTTER, AND MR. WARD STEPHENSON, STEPHENSON BUILDING, ORANGE, TEXAS, HIS ATTORNEY OF RECORD:

Defendant Ruberoid Company, in response to Interrogatories propounded under Rule 33, Federal Rules of Civil Procedure, served on this Defendant's counsel on or about October 14, 1969, herein files its answers to such Interrogatories. Such answers to such Interrogatories bear the same number as the request:

INTERROGATORY NO. 1.

a. Calsilite - A high Timberate pipe covering and Block. This product has been manufactured since the late 1940's and contains 10% asbestos and the balance is composed of diatamaceous earth and Hydrous Lime Silicate.

b. 7M Cement and Asbestos Insulating and Finishing Cement. This product has been manufactured since 1936 and is composed almost entirely of asbestos fibers.

c. T/ na100 - A Tedlar neoprine asbestos insulating jacketting. This product has been manufactured since 1961 and contains 40% asbestos and the remainder consists of Tedlar (poly vinyl floride) and neoprine.

INTERROGATORY 2.

We do not have any contact with workers installing asbestos insulating products. However, we do recommend to our own employees who are in regular contact with asbestos in high dust areas to wear respirators.

INTERROGATORY NO. 3.

Ruberoid Company, itself, has made no such studies. However, this Company is familiar with the studies made by various other agencies, including the United States Government.

INTERROGATORY NO. 4.

See Answer to Interrogatory No. 3.

INTERROGATORY NO. 5.

Yes - These products were sold to contractors, building material, wholesalers, retailers and to other manufacturers. These products are packaged in corrugated cartons or paper bags. These products are sold throughout the United States, except only on a limited basis west of the Rockies.

INTERROGATORY NO. 6.

See Answer to No. 5.

INTERROGATORY NO. 7.

This Interrogatory is objected to as being argumentative, ambiguous, unintelligible, and irrelevant to the issues in this case. Subject to the foregoing objection, this Defendant says that assuming the word "use" means the normal intended usage as insulation products, the answer is No.

INTERROGATORY NO. 8.

Ruberoid Company, itself, has made no such studies. However, this Company is familiar with the studies made by various other agencies, including the United States Government.

INTERROGATORY NO. 9.

No, but see the Answers to Interrogatories No. 3 and No. 8.

INTERROGATORY NO. 10.

We have no control over the working areas where the products which this Company manufactures are being installed by asbestos insulation workers, nor do we have any right to go upon such premises for the purpose of making any inspection. Scientists and others engaged by the United States Government, as well as published literature familiar to this Defendant, indicate that in the areas where insulation workers are installing and using our products, the dust counts have been below the threshold limit values set by the American Conference of Governmental Industrial Hygienists.

INTERROGATORY NO. 11.

This Defendant objects to Interrogatory No. 11 for the reason that it is argumentative, ambiguous, irrelevant and immaterial. The Defendant further objects to such Interrogatory because the same assumes facts which are not in existence, and because the same is not limited to times pertinent to this lawsuit.

INTERROGATORY NO. 12.

This Defendant objects to Interrogatory No. 12 for the reason that it is argumentative, ambiguous, irrelevant and immaterial. The Defendant further objects to such Interrogatory because the same assumes facts which are not in existence, and because the same is not limited to times pertinent to this lawsuit.

INTERROGATORY NO. 13.

This Defendant objects to Interrogatory No. 13 for the reason that it is argumentative, ambiguous, irrelevant and immaterial. The Defendant further objects to such Interrogatory because the same assumes facts which are not in existence, and because the same is not limited to times pertinent to this lawsuit.

INTERROGATORY NO. 14.

No.

INTERROGATORY NO. 15.

This Defendant has no right to enter upon any premises where its materials are being installed in the field; hence, it can take no dust samplings where such products are being installed.

INTERROGATORY NO. 16.

This question is objected to as being irrelevant and immaterial, in that the Plaintiff does not claim he has asbestos-induced lung cancer. Subject to such objection, this Defendant says that although it is not in itself a medical expert, that it understands from its contacts with medical experts that the etiology of cancer is unknown.

INTERROGATORY NO. 17.

This Interrogatory is objected to as being irrelevant and immaterial, in that the Plaintiff does not claim that he has the disease mesothelioma.

INTERROGATORY NO. 18.

Approximately five years ago the company began placing a warning on the packaging containing calsilite. The warning states as follows:

> CAUTION "This product contains asbestos fiber! Inhalation of asbestos in excessive quantities over long periods of time may be harmful. If dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirators approved by the U.S. Bureau of Mines for pneumoconiosis producing dust."

The warning was given at the time it became known to this Defendant that there might be a possibility of harm from long time exposure to high concentration of asbestos dust fibers.

INTERROGATORY NO. 19.

This question is objected to as being irrelevant and immaterial in that Plaintiff does not claim he has the disease of cor pulmonale.

INTERROGATORY NO. 20.

Asbestos fiber is relatively durable. Nothing exists for an infinity of years.

INTERROGATORY NO. 21.

Insofar as this Interrogatory asks about the increase in the use of asbestos, this Defendant says that it is aware of that, but the rest of the Interrogatory is answered No.

INTERROGATORY NO. 22.

No.

INTERROGATORY NO. 23.

No direct contributions of this type are made.

INTERROGATORY NO. 24.

No, but see the Answer to Interrogatory No. 10.

INTERROGATORY NO. 25.

No.

INTERROGATORY NO. 26.

This Defendant objects to Interrogatory No. 26 because it assumes matters of fact which are not admitted but denied, and for the further reason that the question is ambiguous, vague and indefinite, as well as argumentative, irrelevant and immaterial.

INTERROGATORY NO. 27.

Although as worded no answer is required to Interrogatory No. 27, this Defendant says that it is familiar with the testimony of Dr. William H. Stewart, and this Defendant is familiar with the type of products which he was discussing, but this Defendant does not manufacture such products.

INTERROGATORY NO. 28.

This Defendant objects to Interrogatory No. 28 because it assumes matters of fact which are not admitted but denied, and for the further reason

INTERROGATORY NO. 28 (continued).

that the question is ambiguous, vague and indefinite, as well as argumentative, irrelevant and immaterial.

INTERROGATORY NO. 29.

Yes. Our products can always be identified when still in the container. The name of our Company is placed on the containers. In many instances, experts can distinguish the products themselves by their general physical characteristics.

INTERROGATORY NO. 30.

No.

INTERROGATORY NO. 31.

Delaware, April 26, 1929; New York.

INTERROGATORY NO. 32.

Approximately 45 years.

INTERROGATORY NO. 33.

This Defendant contends that respirators are currently on the market which will materially reduce inhalation of asbestos dust and fibers. Such respirators are available under the United States Bureau of Mines Schedule 21B. Tests upon which said approval are based were designed and conducted by that governmental agency and are described in the respiratory protective devices manual published by the American Industrial Hygiene Association, American Conference of Governmental Hygienist 1963. One such respirator, "Dust Foe 77" catalogue No. 10-9600, is manufactured by the Mine Safety Appliance Company.

INTERROGATORY NO. 34.

Such products have been manufactured for years, but are not placed on the open market to be purchased and used by the public generally.

INTERROGATORY NO. 35.

We do not believe that our insulation products are harmful or dangerous when used for their intended purpose. We rely on tests and studies conducted by the American Conference of Governmental Industrial Hygienists and the work of Scientists employed by the United States Government, as well as others. We are aware of two cases of respiratory disease among our Vermont Asbestos Mining employees. The exact medical cause of each lung disease is a matter of conjecture. No cases of respiratory illness have been reported in any of our manufacturing plants.

INTERROGATORY NO. 36.

1. Mr. Reed C. Manosh - Montgomery Center, Vt. 05471 - Dr. L. E. Judd - Enosburg Falls, Vt. 05450.

2. Mr. Arthur J. Lumbra - Montgomery Center, Vt. 05471 - Dr. Thomas G. Howrigan - 67 Fairfield Street, St. Albans, Vt. 05478.

INTERROGATORY NO. 37.

This Interrogatory is objected to as being argumentative, ambiguous, irrelevant, and immaterial. It is also objected to on the basis that it assumes matters that are not admitted but denied and as to which there is no evidence in this record.

INTERROGATORY NO. 38.

Our Calsilite is packaged pre cut in various lengths and is attached by the use of a metal band. Very little cutting is necessary. When it becomes necessary to cut on the job at the point of application, the applicator can use either a hand or power saw for this operation.

Our 7 M Cement is poured into a pail, mixed with water, stirred and then applied with a trowel.

Our T/na100 produces little if any dust during its application as it is saturated with neoprine. Any cutting would usually be done on a band saw and due to the nature of the product, it will not result in any appreciable dust.

INTERROGATORY NO. 39.

See Answer to Interrogatory No. 36.

INTERROGATORY NO. 40.

No.

INTERROGATORIES NO. 41-44.

Plaintiff has been furnished a copy of our 1967 and 1968 Annual Reports containing the information inquired about.

INTERROGATORY NO. 45.

No Answer required.

INTERROGATORY NO. 46.

This Defendant objects to Interrogatory No. 46 on the basis that it inquires about a matter of opinion as opposed to a matter of fact. Subject to the foregoing objection, this Defendant would say that it has no basis upon which to form an opinion regarding the matter inquired about.

INTERROGATORIES NO. 47-84.

This Defendant objects to these Interrogatories because the same call for an agreement on matters of law, and for the further reason that said Interrogatories call for conclusions and opinions regarding matters of law.

Robert E. Barnes.

Sworn to and subscribed before me the undersigned authority on this the 23rd day of December, 1969.

Notary Public in and for
Jefferson County, Texas.

Respectfully submitted,

BARNES & BARNES

BY

2315 Calder - P.O. Box 5098,
Beaumont, Texas,
Telephone 833-8601,
Attorneys for Ruberoid Company.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon Mr. Ward Stephenson, Stephenson Building, Orange, Texas, Attorney for Plaintiff, by mailing a copy to his address by certified mail on the 23rd day of December, 1969, and a copy was served on each and all other counsel of record by depositing the same in the United States mail properly addressed, with postage paid, on the 23rd day of December, 1969.

Robert E. Barnes

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
JUL 1 1970
JAMES R. COONEY, CLERK

SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.

CIVIL ACTION NO. 6329.

DEFENDANT RUBEROID COMPANY'S REPLIES TO PLAINTIFF'S SECOND SET OF INTERROGATORIES

TO THE PLAINTIFF, SAMUEL R. POTTER, AND MR. WARD STEPHENSON, STEPHENSON BUILDING, ORANGE, TEXAS, HIS ATTORNEY OF RECORD:

Defendant Ruberoid Company, in response to a Second Set of Interrogatories propounded under Rule 33, Federal Rules of Civil Procedure, and served upon this Defendant's counsel, herein files its answers to such Interrogatories, which answers to such Interrogatories bear the same number as the request:

INTERROGATORY NO. 1:

Most individuals in our Company are aware that studies have been made but cannot recall the specific persons or agencies making such studies. They all have heard of Dr. Irving J. Selikoff and are aware that he has made certain studies. The Sales Manager of our Industrial Products Division was the only one of six individuals contacted that could quote the name of specific studies. He was aware that studies were conducted by the U.S. Public Health Service, The New York Academy of Sciences, Mt. Sinai Hospital (Environmental Sciences Laboratory - Mt. Sinai School of Medicine), and the Insulation Industry Hygiene Research Program. The last three were headed by Dr. Selikoff.

In response to the above studies, the Company has over the years taken steps to reduce the dust exposure to its employees and has provided them with protective equipment.

INTERROGATORY NO. 2:

Same answer as given to Interrogatory No. 1.

INTERROGATORY NO. 3:

None of the individuals contacted were knowledgeable as to the specific independent organizations, contractors and government agencies who have conducted dust counts. As indicated to you in response to the first set of Interrogatories, the Company does conduct dust counts in its own plants.

INTERROGATORY NO. 4:

Various studies and the publicity resulting from these studies indicated that there might be a possibility of harm from long time exposure to high concentration of asbestos dust fibers. Prior to the time we started labeling, there was little publicity in this area.

INTERROGATORY NO. 5:

In general our Company does not recognize that just any exposure to asbestos will cause asbestosis. However, the Company is aware that prolonged exposure to asbestos fibers without proper safety precaution may cause asbestosis in some people. The Company has been aware of this for about five to six years. In response to this, we have added equipment to our various plants using asbestos fibers to collect and eliminate dust. Also, all employees in contact with asbestos fibers are required to wear U. S. Bureau of Mines approved respirators.

Robert E. Barnes.

Sworn to and subscribed before me, the undersigned authority, on this the 1ST day of July, 1970.

Notary Public in and for
Jefferson County, Texas.

Respectfully submitted,

BARNES & BARNES

BY Robert E. Barnes

2315 Calder - P.O. Box 5098,
Beaumont, Texas 77706,
Telephone 833-8601,
Attorneys for Ruberoid Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon Mr. Ward Stephenson, Stephenson Building, Orange, Texas, Attorney for Plaintiff, by mailing the same to his address on the 1ST day of July, 1970, and a copy was served on each and all other counsel of record by depositing the same in the United States mail properly addressed, with postage paid, on the 1ST day of July, 1970.

Robert E. Barnes
Robert E. Barnes.

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
JAN 17 1972
JAMES R. COONEY, CLERK
BY DEPUTY

SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.

CIVIL ACTION NO. 6329.

REPLIES OF THE DEFENDANT RUBEROID COMPANY TO INTERROGATORIES PROPOUNDED BY THE PLAINTIFF

TO: PLAINTIFF, SAMUEL R. POTTER, AND MR. WARD STEPHENSON, STEPHENSON AND THOMPSON, STEPHENSON BUILDING, ORANGE, TEXAS, 77630, HIS ATTORNEY OF RECORD:

COME NOW Ruberoid Company, one of the Defendants in the captioned lawsuit, pursuant to agreement by counsel for the Plaintiff and files these Replies to Plaintiff's Interrogatories:

INTERROGATORY NO. 1:

Yes.

INTERROGATORY NO. 2:

No Answer required.

INTERROGATORY NO. 3:

The asbestos free calsilites.

INTERROGATORY NO. 4:

Since July and August of 1971.

INTERROGATORY NO. 5:

The exact qualitative makeup of this product is a trade secret subject to protection from disclosure under the Federal Rules, and for this reason this Defendant refuses to give the detailed constituent of this makeup/asbestos free product.

Robert E. Barnes

Robert E. Barnes
BARNES & BARNES
2315 Calder- P. O. Box 5098
Beaumont, Texas 77702
Attorneys for the Defendant,
Ruberoid Company.

THE STATE OF TEXAS |
|
COUNTY OF JEFFERSON |

Robert E. Barnes, being duly sworn, on oath says that he is the attorney of record for the Defendant, Ruberoid Company, in the above cause, and as such is duly authorized to make, file, and serve the foregoing answers to the Interrogatories indicated in this affidavit, and that he does so acting on such authority and authorization; that he has read over the foregoing Answers, and the same are true and correct.

Robert E. Barnes.

SWORN TO AND SUBSCRIBED before me, the undersigned authority, on this 14th day of January, 1972.

Notary Public in and for
Jefferson County, Texas.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was forwarded to all counsel of record on this 14th day of January, 1972.

Robert E. Barnes.

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

FILED
U. S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
JAN 17 1972
JAMES R. COONEY, CLERK
BY DEPUTY

SAMUEL R. POTTER

VS.

FIBREBOARD PAPER PRODUCTS CORPORATION, ET AL.

CIVIL ACTION NO. 6329.

REPLIES OF THE DEFENDANT, RUBEROID COMPANY TO INTERROGATORIES PROPOUNDED BY THE PLAINTIFF

COMES NOW Ruberoid Company, one of the Defendants in the captioned lawsuit, pursuant to agreement by counsel for the Plaintiff and files these Replies to Plaintiff's Interrogatories:

INTERROGATORY NO. 1:

Yes.

INTERROGATORY NO. 2:

No answer required.

Robert E. Barnes

Robert E. Barnes
BARNES & BARNES
2315 Calder - P. O. Box 5098
Beaumont, Texas 77702
Attorneys for the Defendant,
Ruberoid Company.

THE STATE OF TEXAS

COUNTY OF JEFFERSON

Robert E. Barnes, being duly sworn, on oath says that he is attorney of record for the defendant, Ruberoid Company, in the above cause, and as such is duly authorized to make, file and serve the foregoing answers to the Interrogatories indicated in this affidavit, and that he does so acting on such authority and authorization; that he has read over the foregoing Answers and the same are true and correct.

Robert E. Barnes.

Robert E. Barnes.

SWORN TO AND SUBSCRIBED before me, the undersigned authority, on this the 14th day of January, 1972.

Notary Public in and for
Jefferson County, Texas

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was forwarded to all counsel of record on the 14th day of January, 1972.

(Robert E. Barnes.