

NO. 81-G-1331

BARBARA MEYER	§	IN THE DISTRICT COURT OF
VS.	§	BRAZORIA COUNTY, TEXAS
JOHNS-MANVILLE SALES	§	
CORPORATION, ET AL	§	239TH JUDICIAL DISTRICT

ST0010128

DEFENDANT'S ANSWERS TO PLAINTIFF'S INTERROGATORIES

TO: Plaintiff, BARBARA MEYER, by and through her attorney of record, Talmadge Boyd, Esq., Williams & Boyd, 1212 Main Street, Suite No. 500, Houston, Texas, 77002.

Pursuant to Rule 168 of the Texas Rules of Civil Procedure, defendant, THE DOW CHEMICAL COMPANY, serves these answers to plaintiff's interrogatories upon you, the answers to which have been made under oath separately and in writing, within thirty (30) days after service of such interrogatories and have been forwarded to the undersigned counsel of record. The defendant also agrees that it will continue to supplement its answers to interrogatories as provided by Rule 168. A true copy of these answers to interrogatories is being filed in the Clerk's office together with proof of service thereof.

Respectfully submitted,

By Andrew S Hanen  
ANDREW S. HANEN - #08905800

ANDREWS & KURTH  
4200 Texas Commerce Tower  
Houston, Texas 77002  
(713) 220-4148

ATTORNEYS FOR DEFENDANT,  
THE DOW CHEMICAL COMPANY

CERTIFICATE OF SERVICE

I, Andrew S. Hanen, hereby certify that a true and correct copy of the above and foregoing Defendant's Answers to Plaintiff's Interrogatories was sent to opposing counsel of record by United States certified mail, return receipt requested, on this the 26<sup>th</sup> day of May, 1982.

Andrew S Hanen  
ANDREW S. HANEN

NO. 81-G-1331

BARBARA MEYER	§	IN THE DISTRICT COURT OF
VS.	§	BRAZORIA COUNTY, TEXAS
JOHNS-MANVILLE SALES	§	
CORPORATION, ET AL	§	239TH JUDICIAL DISTRICT

ANSWERS TO PLAINTIFF'S INTERROGATORIES

6. Please state the full and complete name and most current address of each person who worked in the same department(s) of Dow Chemical Company, Brazoria County, Texas, as Jack Meyer, from his beginning date of employment in 1941 until the end of his employment, March 31, 1966.

ST0010129

MASTER LIST

<u>Employee</u>	<u>Address</u>
Abel, A.	
Abel, A. R.	
Accardo, J.	
Adams, C. D.	
Adams, J. W.	
Adams, V. O.	
Adkins, B. R.	
Aguillard, E. E.	
Akins, M. O.	
Albertson, J. R., Jr.	
Alders, G. M.	
Alexander, N. W.	
Allen, B. A.	
Allen, B. J.	1016 Sycamore Lake Jackson, TX 77566
Allen, C. B.	128 Redbud Lake Jackson, TX 77566
Allen, E. R.	

ST0010130

<u>Employee</u>	<u>Address</u>
Allen, H. C.	
Allen, H. G.	
Allen, R. A.	
Allison, G. D.	
Ammann, C. F.	P. O. Box 182 Hilltop Lake, TX 77871
Anderson, R. D.	
Andrews, J. A.	Box 2322 Freeport, TX 77541
Andrews, J. C.	2 South Kaysie Dr. Angleton, TX 77515
Andrus, P. F.	
Arrington, A. R.	
Arrington, T. W.	1315 W. 8th Freeport, TX 77541
Atkins, J. B.	704 N. Judson St. Navasota, TX 77868
Atkinson, O. L.	P. O. Box 521 Colmesneil, TX 75938
Babcock, T. F.	
Baca, R. T.	
Badders, J. E.	8924 S. F. Austin, Rt. 3 Freeport, TX 77541
Bahler, R. F.	Rt. 1, Box 318B Manvel, TX 77578

ST0010131

<u>Employee</u>	<u>Address</u>
Bailey, W. E.	
Bair, A. M.	Box 231 Sweeny, TX 77480
Baker, J. E., Jr.	
Baker, E. L.	
Baker, E. T.	
Baker, E. V.	Rt. 3 Box 441 Angleton, TX 77515
Baker, L. E.	304 Oleander Lake Jackson, TX 77566
Ballowe, J. B.	615 Laser Bend Hot Springs, AR 71901
Banks, J. H.	
Barbarick, T. L.	
Barber, F. L. D.	1824 N. Ave. G Freeport, TX 77541
Barcelo, T. H.	
Barker, J. R.	
Barnes, D. A.	Rt. 2 Box 540 Sweeny, TX 77480
Barnes, J. N., Jr.	
Barnes, S. E.	
Barnett, R. C.	

ST0010132

<u>Employee</u>	<u>Address</u>
Barr, H. L.	
Basham, J. M.	Box 861 Clute, TX 77531
Batchman, R. L.	1603 W. 8th Freeport, TX 77541
Baughman, J. P.	
Bays, J. G., Jr.	22 Old Angleton Rd. Lake Jackson, TX 77566
Baxley, W. R.	
Becker, I. J.	
Beets, J. H.	
Bell, I. D.	134 S. 11th St. West Columbia, TX 77486
Benkula, C. R.	
Bennett, C. H.	
Bennett, J.	
Bennett, L. A.	
Bennett, T. R.	
Benson, J. W.	
Benton, H. L.	
Berlanga, J.	718 Dent Drive Clute, TX 77531

ST0010133

<u>Employee</u>	<u>Address</u>
Berry, P. W.	
Berry, R.	326 E. Coombs Alvin, TX 77511
Berry, T. H.	
Bethel, M. B., Jr.	Box 1074 Hilltop Lake, TX 77871
Bevills, F. W.	
Bezecny, G. W.	
Bierhalter, F. A.	
Bihl, F. E.	
Bilbo, L. R.	1719 Ave. T Freeport, TX 77541
Billie, C. W.	
Billingsley, L. E.	
Billington, L. W.	
Bishop, C. L.	
Bishop, W. M.	P.O. Box 743 Seguin, TX 78155
Blackmon, W. H.	
Blackmon, W. P.	
Blackstock, C. E.	Box 1372 Medina, TX 78055

ST0010134

<u>Employee</u>	<u>Address</u>
Blackwell, W. R.	Rt. 1, Box 153 Muldoon, TX 78949
Blair, C. W.	
Blair, F. A.	
Blair, V. H.	Rt. 2, Box 202 Bedias, TX 77831
Bluhm, G. M.	
Blunck, H. R.	135 Woodcrest Clute, TX 77531
Bohannon, J. D.	
Bolten, J. W.	129 Blossom Lake Jackson, TX 77566
Bones, C. P.	
Bonner, L. G.	
Booth, R. E.	
Boothe, H. L.	Rt. 2, Box 21 Thorndale, TX 76577
Bottoms, E. O.	
Borel, C. H.	
Borey, R. H., Jr.	
Botsford, A. J.	
Boudreaux, H. J., Jr.	

ST0010135

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Bowen, R. L.	
Boyd, W. W.	
Boyette, W. S.	
Brady, E.	308 So. Oaks Dr. Lake Jackson, TX 77566
Brandon, Ira M.	
Brannon, E. M.	
Breazeale, A. E.	623 West St. Clute, TX 77531
Brewer, C.	
Brewer, J. C.	
Briggs, M. A.	
Brim, W. D.	
Brinkley, J. L.	
Brinson, C. E.	
Brinson, J. D.	
Britt, H. T.	Box 158 Brazoria, TX 77422
Broadway, C. F.	
Brock, M. L.	719 S. Belknap Mexia, TX 76667

ST0010136

<u>Employee</u>	<u>Address</u>
Brod, Raymond J.	
Broussard, L. I.	1719 W. 10th Freeport, TX 77541
Brown, A. B.	
Brown, C. L.	
Brown, C. R.	415 Gardenia Lake Jackson, TX 77566
Brown, D. W.	
Brown, F. S.	1273 Pecan Clute, TX 77531
Brown, L. D.	
Brown, R.	
Brown, W. C.	
Browning, K.	1804 N. Hwy. 288 Clute, TX 77531
Browning, K. G.	118 Schrader Lane Lake Jackson, TX 77566
Browning, W. K., Jr.	
Bruce, J.	
Brumbeloe, H. W., Jr.	
Brunt, G. V.	
Bryan, J. R.	

ST0010137

<u>Employee</u>	<u>Address</u>
Bryant, J. E.	515 N. Yaupon Clute, TX 77531
Bryant, J. T.	
Bryant, R. F.	141 Trenckmann Rd. Sealy, TX 77474
Buchanan, W. H.	
Buford, G. E.	
Buis, R. V.	
Bullard, G.	Box 1401 Madisonville, TX 77864
Bullard, J. F.	
Bumpass, E. R.	Route 1 Hawley, TX 79525
Burch, B. W.	P.O. Box 675 Newton, TX 75966
Burdick, B. C.	
Burk, J. H.	
Burke, V. C.	Box 193 Brazoria, TX 77422
Burke, W. S.	136 Sycamore Dr. Clute, TX 77531
Burke, W. V.	Box 255 Brazoria, TX 77422
Burkett, J. D.	
Burkett, R. D.	Rt. 3, Box 3096 Brazoria, TX 77422

ST0010138

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Burnett, F. D.	
Burnett, T. H.	Box 2588 Freeport, TX 77541
Burnette, E. S.	Box 737 Brazoria, TX 77422
Burns, M. N.	Box 537 Angleton, TX 77515
Burr, J. M., Jr.	1230 W. 10th Freeport, TX 77541
Burridge, C. E., Jr.	223 Lee Avenue Freeport, TX 77541
Burt, J. D.	
Burton, J. D.	
Bush, F. H.	Rt. 4 Box 418 New York Street Brazoria, TX 77422
Bushnell, T. D.	
Butcher, C. C.	
Butler, C. D.	
Butler, L. C.	
Byerly, R. P.	
Bynam, D.	
Byrd, J. W.	
Byrnes, F. E.	

ST0010139

<u>Employee</u>	<u>Address</u>
Cadenhead, H. V.	P. O. Box 252 Brazoria, TX 77422
Caldwell, G. W.	
Calhoun, W. C.	Rt. 3, Box 190 Gonzales, TX 78629
Callen, K. E.	101 Laurel Lake Jackson, TX 77566
Calley, H. R.	Box 121 Delight, AR 71940
Calvin, C.	517 Wisteria Lake Jackson, TX 77566
Cameron, W. B.	
Camp, H. A.	431 W. 2nd Freeport, TX 77541
Cantey, J. M.	
Capell, A. R.	132 Begonia Lake Jackson, TX 77566
Capps, J. E.	Rt. 4 Angleton, TX 77515
Carey, J. T.	Rt. 2, Box 618 Newton, TX 75966
Cargle, W. R.	
Carlisle, E. H.	
Carpenter, M. L.	
Carroll, L. H.	
Carroll, R. H.	

ST0010140

<u>Employee</u>	<u>Address</u>
Carruth, C. E.	
Carson, T. H.	534 Circle Way Lake Jackson, TX 77566
Carter, E. J.	806 Crockett West Columbia, TX 77486
Carter, E. R.	
Carter, G. R.	
Carter, R.	
Casbergne, J. P.	
Case, W. M.	
Cast, K. D.	108 Tamarisk Trail Lake Jackson, TX 77566
Castleberry, C. A.	
Catlege, W. S.	
Cecil, W. W.	
Cesmirosky, J.	Rt. 1 Freeport, TX 77541
Chalberg, R. P.	Rt. 3, 502 Primrose Freeport, TX 77541
Chambers, O. L.	
Chapman, H. L.	
Chappell, J.	428 Lazy Lane Clute, TX 77531

14101001S

<u>Employee</u>	<u>Address</u>
Ceatham, H.	
Christa, Z. D.	
Christian, V. A.	
Cieslinski, M. A.	Box 1362 Angleton, TX 77515
Clanton, E. L.	
Clark, A. B.	
Clark, A. O.	
Clark, F. B., Jr.	
Clark, J. T.	
Clark, R. P.	642 Gray West Columbia, TX 77486
Clawson, J. D.	
Claxton, M. R.	
Clement, O. H., Jr.	622 Humble Dr. West Columbia, TX 77486
Clements, S.	
Cobb, C. L.	108 Railroad Dr. Clute, TX 77531
Cobb, D. R.	Rt. 2 Box 588 Freeport, TX 77541
Cobb, T. F.	

ST0010142

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Coddington, J. D.	
Coldwater, J. A.	11710 Welcome Dr. San Antonio, TX 78233
Cole, M. H.	
Cole, M. W.	
Collerain, E. D.	
Colley, R. L.	Box 524 Lake Jackson, TX 77566
Collom, R. H.	
Comley, H. H.	Star Rt. 3 Box 107G Canyon Lake, TX 78130
Comley, W. E.	Rt. 2 Box 2028 Brazoria, TX 77422
Connor, M. N.	
Cook, A.	
Cook, C. E.	
Cook, J. D.	
Cook, W. D.	
Cooper, C. A.	
Cooper, J. S.	

ST0010143

<u>Employee</u>	<u>Address</u>
Coots, A. P.	
Copeland, W. A.	413 Wisteria Lake Jackson, TX 77566
Cotharn, W. W.	
Cowan, J. H.	
Cozart, G. L.	P.O. Box 308 Normangee, TX 77871
Craig, J. A.	
Crain, J. E.	
Crouch, A. L.	
Crouch, D. C.	
Crouch, F. B., Jr.	
Crump, L.	
Culwell, I. J.	
Cunningham, E. L.	
Cureton, J. A.	
Curtis, L. A.	
Dacke, W. W.	Rt. 2 Box 2110 Brazoria, TX 77422
Danels, T. F.	

ST0010144

<u>Employee</u>	<u>Address</u>
Danford, G.	
Danforth, G. T.	
Daniels, F. M.	
Dannhaus, A. J.	
Dannhaus, F. W.	1871 Acacia Circle Freeport, TX 77541
Darden, J. B.	
Davenport, D. L.	
David, M. J.	
Davidson, R. E.	
Davis, A. D.	
Davis, B. E.	
Davis, C. W.	
Davis, D. W.	323 Goliad Clute, TX 77531
Davis, I. D.	
Davis, J. W.	Rt. 3 Box 8930 Hwy. 36 Freeport, TX 77541
Davis, L. C.	
Davis, L. F.	Rt. 1 Freeport, TX 77541

ST0010145

<u>Employee</u>	<u>Address</u>
Davis, W. H.	
Dawson, J. P.	
Deavers, N. L.	
DeBlanc, A. J.	
Deerman, G. M.	301 East Bronco Bend Angleton, TX 77515
Deerman, V. W.	1606 W. 6th Freeport, TX 77541
Dement, C. H.	
Denton, R. F.	
Denton, W. H.	1310 Main Teague, TX 75860
Dezavala, L. K.	1619 W. 10th Freeport, TX 77541
Dickerson, Bruce	413 Winding Way Lake Jackson, TX 77566
Dickerson, J. C.	
Dilleshaw, C. D., Jr.	
Dittrich, A. R.	
Dixon, E. H.	
Dixon, J. M.	
Dixon, W. J.	320-97

94101001S

<u>Employee</u>	<u>Address</u>
Dixon, W. W.	
Dodd, K. R.	
Dolgener, W. L.	
Domingues, O. P.	1115 W. 4th Freeport, TX 77541
Donahoe, B. W.	
Dorman, F.	
Dorton, L. L.	Rt. 1 Box 301 Cedar Creek, TX 78612
Doss, R. L.	116 Balsam Lake Jackson, TX 77566
Douglas, R. F.	
Downing, J. E.	
Doyal, W. R.	
Drake, D. B.	206 Redwood Lake Jackson, TX 77566
Drake, R. V.	
Dreggors, O. C.	6824 Willamette Austin, TX 78723
Drennan, F. R.	1261 Chevy Chase Angleton, TX 77515
Dudney, V. H.	
Dugas, S. J.	320-97

ST0010147

<u>Employee</u>	<u>Address</u>
Duhon, P. D.	
Dunaway, M. M.	200 Primrose Rt. 3 Freeport, TX 77541
Dunbar, S. L.	Rt. 4 203 N. Oregon Brazoria, TX 77422
Duncan, W. M.	Rt. 2 Box 80H Buffalo, TX 75831
Durdin, J. T.	1140 Second St. Clute, TX 77531
Duval, E. A.	322 Caladium Lake Jackson, TX 77566
Dykema, H. W.	
Dyson, J. F.	
Earle, A. N.	529 Oak Drive Lake Jackson, TX 77566
Earles, W. S.	
Earnest, B. D.	
Easley, T. R.	
Eastburn, R. O.	
Eaton, A. E.	Rt. 4 Box 183B Joplin, MO 64801
Ebner, M. F.	
Edquist, S. F.	525 Oak Drive Lake Jackson, TX 77566
Edwards, R. C.	

84101001S

<u>Employee</u>	<u>Address</u>
Efird, H. S.	
Elkin, W. A.	
Elkins, A. G.	
Elkins, H. O.	Rt. 1 Edna, TX 77597
Elkins, R. C.	
Elliott, W. J.	1302 Crosby Portland, TX 78374
Ellis, C. A.	
England, K. W.	
English, J. L.	512 Magnolia Lake Jackson, TX 77566
Eppes, L. D.	113 Gladiola Lake Jackson, TX 77566
Ercanbrack, E. J.	
Eubanks, J. W.	
Evans, C. J.	
Evans, C. N.	P.O. Box 1242 Clute, TX 77531
Evans, G. E.	
Evans, H. H.	
Evans, J. O.	

ST0010149

<u>Employee</u>	<u>Address</u>
Evans, W. A.	160 Sycamore Richwood, TX 77531
Evans, W. R.	206 Jonquil Lake Jackson, TX 77566
Ewing, E. H.	
Faldyn, J. S.	
Faulk, A. R., Sr.	517 W. 9th Freeport, TX 77541
Farley, E. W.	
Farmer, N. R.	
Farris, O. R.	124 Ash Lane Lake Jackson, TX 77566
Fenley, C. D.	
Fief, F. G.	Rt. 1 3518 Hoskins Md. Rd. Danbury, TX 77534
Fields, J. J.	
Fink, G. E.	
Fipps, A. E.	206 Camellia Lake Jackson, TX 77566
Fischer, H. K.	
Fisher, E. T.	
Fitts, C. E.	
Fitzgerald, J. T.	403 N. Ave. B Freeport, TX 77541

ST0010150

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Flessner, W. C.	P.O. Box 114 Old Ocean, TX 77463
Flessner, W. E.	
Fletcher, A. E.	Rt. 3 Box 7443 Freeport, TX 77541
Florow, J. M.	
Fluker, S. B.	Rt. 2 Box 492 Freeport, TX 77541
Foley, J. W.	Rt. 3 Box 677 Whitney, TX 76692
Fontaine, C. C.	
Forbes, M. B.	
Ford, J. D., Jr.	
Fore, W. H.	
Foreman, H. S.	
Fortenberry, J. T.	
Fowler, R. R.	#1 Troy Lane West Columbia, TX 76692
Fowler, S.	
Fowler, W. E.	
Fox, J. H.	320-010

ST0010151

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Franciskovich, M. J.	
Franz, A. M.	
Frazier, D. D.	
Freeman, E. E.	
Freeman, E. W.	1233 W. 10th Freeport, TX 77541
Fregia, W. E.	
French, J. E.	
French, W. L.	
Frey, S. A.	124 Jasmine Lake Jackson, TX 77566
Frieda, H. W.	1226 W. 11th Freeport, TX 77541
Fry, J. S.	
Fullen, A. A.	
Funderburg, C. C.	Box 724 Lake Jackson, TX 77566
Futch, E. M.	
Galyean, C. H.	
Gammage, C. E.	

ST0010152

<u>Employee</u>	<u>Address</u>
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Gammill, R. J., Jr.	
Gardner, J. R.	
Garrett, B. G.	
Garrett, J. C.	Box 642 Angleton, TX 77515
Garrison, W. L.	
Gartman, J. L.	
Gaston, I. M.	
Gates, L.	
Gaubatz, W. M.	#4 Sherwood Drive Clute, Texas 77531
Gautney, L. M.	
Gay, E. C.	
Gay, J. R.	
Gebhardt, C. H.	
Geissen, F. J.	Box 184 Danbury, TX 77534
Gentry, H. J.	221 Caroline Rt. 1 Bullard, TX 75737
George, D. T.	Rt. 2 Box 151-L Bastrop, TX 78602

ST0010153

<u>Employee</u>	<u>Address</u>
George, S. G.	820 Magnolia Lake Jackson, TX 77566
Gibbons, R. D.	Rt. 3 Box 162 Timpson, TX 75975
Gibbs, T. R.	
Gifford, C. M.	
Giles, R. C.	P.O. Box 1072 Angleton, TX 77515
Gilley, F. J.	
Gilley, G. L.	
Gilley, L.	
Gilliam, Stacy	
Gilmore, C. E.	
Givens, C. O.	1201 Woodlawn Center, TX 75935
Glasgow, T. W.	
Glenn, M. S.	
Gloger, L. A.	
Glosson, J. O.	
Glover, B. R.	
Good, T. A.	1603 North Rd. Lake Jackson, TX 77566

ST0010154

<u>Employee</u>	<u>Address</u>
Goodman, R. A.	
Goodrum, C. B.	
Goodrum, C. G.	
Goolsby, R. D.	114 S. Mattson West Columbia, TX 77486
Gore, O. A.	1104 Kyle Clute, TX 77531
Gray, C. S.	514 North Ave. A Freeport, TX 77541
Gray, F. W.	
Gray, V. E.	
Greear, R. C.	
Green, J. R.	120 Cherry Lake Jackson, TX 77566
Green, O. T.	
Green, T. A.	705 Shady Lane Angleton, TX 77515
Greenberg, J. D.	
Greenhaw, E. A.	
Griffin, D. L.	
Griffin, J. C.	
Grigar, S. S.	1505 George St. Rosenberg, TX 77471

ST0010155

