

FILE NAME: National Gypsum (NG)

DATE: 1988 NG076

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DOCUMENT DESCRIPTION: Legal - Response of Defendant National Gypsum to Plaintiffs' Request for Production

DEHAY & BLANCHARD

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September 9, 1988

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MARGARET ANN ROSE

Ms. Lisa Blue
Baron & Budd
Tenth Floor, Dallas Federal
Savings Tower
8333 Douglas Avenue
Dallas, Texas 75225

Re: Cause No. 87-16079-D; Georgiann Rowell, et al.
v. Armstrong World Industries, Inc. et al.

Dear Lisa:

Enclosed please find Response of Defendant National
Gypsum Company To Plaintiffs' Request For Production filed in
the above-referenced matter.

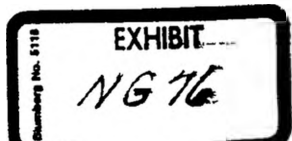
Sincerely,

Margaret Ann Rose

Margaret Ann Rose

MAR/lkt
Enclosure

cc: Mr. C. Edward Fowler, Jr.
Mr. Joe Michael Russell
Mr. Joe Riddles
Mr. James T. Foley
Mr. Herbert Boyland



GEORGIANN ROWELL, et al.,	§	IN THE DISTRICT COURT OF
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	DALLAS COUNTY, TEXAS
ARMSTRONG WORLD INDUSTRIES,	§	
INC., et al.	§	
	§	
Defendants.	§	95TH JUDICIAL DISTRICT

RESPONSE OF DEFENDANT NATIONAL GYPSUM
COMPANY TO PLAINTIFFS' REQUEST FOR PRODUCTION

Defendant, NATIONAL GYPSUM COMPANY ("National Gypsum") responds to Plaintiffs' Request for Production submitted by Plaintiffs, GEORGIANN ROWELL, Individually and as Personal Representative of the Estate and Heirs of WINFORD ROWELL; BESSIE S. SHEPHERD, Individually and as Personal Representative of the Estate and Heirs of THOMAS P. SHEPHERD; LARRY D. HAYS and DONNA HAYS; VERLON URBAN and EMO JEAN URBAN; OLIVER J. MORGAN and MARGUERITE MORGAN ("Plaintiffs") as follows:

GENERAL OBJECTIONS

Defendant National Gypsum objects to any request or instruction that purports to impose upon Defendant any obligation not expressly set forth in the Texas Rules of Civil Procedure.

RESPONSE

1. The last known address of the following individuals:

- (a) Jack E. Jones
- (b) F.R. Griffin
- (c) J.C. Quinly
- (d) C.D. Harless
- (e) R. Beitz
- (f) W. Withrock

RESPONSE: National Gypsum objects to this interrogatory on

the basis that the requested information is not relevant to this action, in the absence of some explanation from Plaintiffs' counsel which establishes relevance. National Gypsum objects to this interrogatory because it is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, National Gypsum states that Mr. Quinley is scheduled to be deposed on August 30, 1988, that National Gypsum has agreed to consider producing Mr. Withrock following Mr. Quinley's deposition, and that National Gypsum provided Mr. Jones' address to Plaintiffs' counsel in another case. Jack E. Jones' address is 12 Summertree Lane, P.O. Box 1271, Shallotte, North Carolina 28459.

2. Complete and legible copies of the three letters which are attached hereto and marked Exhibits A, B and C.

RESPONSE: More legible copies of the three letters are attached to these responses.

Respectfully submitted,

DeHAY & BLANCHARD



GARY D. ELLISTON

SBN 06584700

J. CARLISLE DeHAY

SBN 05644000

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Dallas, TX 75201

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ATTORNEYS FOR NATIONAL GYPSUM
COMPANY

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One Liberty Place, Ste. 4900
1650 Market Street
Philadelphia, PA 19103
OF COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to Lisa Blue, Baron & Budd, 8333 Douglas Avenue, 10th Floor, Dallas, TX 75225 by U.S. Certified Mail, Return Receipt Requested and by regular U.S. Mail, postage prepaid to all other counsel of record in the above-referenced matter on the 9th day of September, 1988.


GARY D. ELLISTON