

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION



JOHN T. EDWARDS and
BETTY A. EDWARDS,

Plaintiffs,

vs.

CASE NO. 81-51-CW-FTMK

NATIONAL GYPSUM COMPANY,

Defendant.

DEFENDANT'S AMENDED SECOND SUPPLEMENTAL
ANSWERS TO PLAINTIFFS' FIRST RULE
33 INTERROGATORIES

The Defendant, National Gypsum Company, submits its amended second supplemental answers to Plaintiff's First Rule 33 Interrogatories and as its response to question 28 attaches hereto as Exhibit "A" pursuant to a prior stipulation of counsel a listing of all workers' compensation cases of which the Defendant has knowledge from its corporate records by name of claimant, jurisdiction, and date of filing of claim filed prior to January 1, 1973. Each of these cases involves a claim by the worker alleging inter alia an asbestos-related disease.

I HEREBY CERTIFY that a true copy hereof has been furnished by hand delivery this 14th day of February, 1983, to Russell W. Budd, Esquire, 1050 Dallas Federal Savings Tower, Dallas, Texas 75225, Attorney for Plaintiffs.



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TMB:db
#1955
2/14/83

WORKER'S COMPENSATION CLAIMS AGAINST NATIONAL
GYPSUM COMPANY BEFORE JANUARY 1, 1973
ALLEGING AN ASBESTOS-RELATED DISEASE*

<u>CASE TITLE</u>	<u>JURISDICTION</u>	<u>DATE</u>
Peter Paul Armenti vs. NGC	Morris County, NJ	1/27/59
Louis D. Cavinato vs. NGC	Morristown, NJ	4/19/65
Alton E. Bass vs. NGC et al.	Orleans Parish, LA	2/28/68
Louis Gremillion vs. NGC et al.	Orleans Parish, LA	5/3/68
Royal A. Ellis vs. NGC	New Orleans, LA	5/27/69
William P. Burns vs. NGC	Morristown, NJ	9/12/69
John Weber vs. NGC	Trenton, NJ	10/10/69
Joseph Schoenig vs. NGC	Trenton, NJ	8/18/70
Frank Ansede vs. NGC	Trenton, NJ	1/25/71
John Kocisko vs. NGC	Trenton, NJ	5/24/71
Jerry M. DeCaro vs. NGC	Trenton, NJ	10/4/71
Jerry Wells vs. NGC et al.	Orleans Parish, LA	9/8/72
Timothy Gaylord vs. NGC	Trenton, NJ	11/29/72
Alexander C. Parr vs. NGC	Trenton, NJ	12/15/72

*The information provided above was extracted from corporate records and is believed to be accurate. No guarantee or warranty is made in connection with this answer that no other workers may have filed worker's compensation claims in some jurisdictions alleging an asbestos-related disease of which this defendant would not have any knowledge. The records of various insurance carriers or self-insured servicing agents were not reviewed in the preparation of this answer in that this defendant has no control over such records or their possible retention periods.