

CAUSE NO. B-126,986

RUSSELL ALLEN, ET AL. § IN THE DISTRICT COURT OF
 §
VS. § JEFFERSON COUNTY, T E X A S
 §
AMERICAN PETROFINA, INC., §
ET AL. § 60TH JUDICIAL DISTRICT

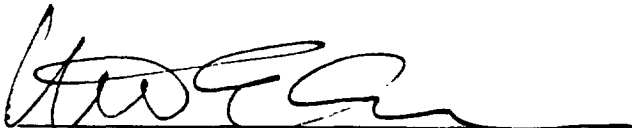
DEFENDANT'S RESPONSE TO REQUEST FOR PRODUCTION

TO: Russell H. Allen, et ux, et al by and through their attorneys of record, Joseph C. Blanks, Reaud, Morgan & Quinn, 909 Laurel Street, Beaumont, Texas 77701 and Herschel L. Hobson, 2190 Harrison, Beaumont, Texas 77701.

COMES NOW, Defendant, American Petroleum Institute, and pursuant to Rule 167, Texas Rules of Civil Procedure, files these its Responses to Request for Production filed by Plaintiffs.

Respectfully submitted,

STUBBEMAN, McRAE, SEALY,
LAUGHLIN & BROWDER, INC.

By 

William E. Schweinle, Jr.
State Bar #17876000
Reginald H. Wood
State Bar #21905500
700 Louisiana, Suite 2400
Houston, TX 77002
(713) 237-1100
(713) 222-2842 (telecopier)

ATTORNEYS FOR AMERICAN
PETROLEUM INSTITUTE

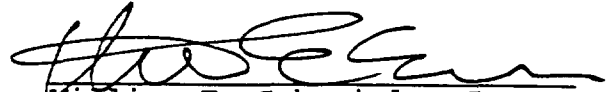
012068

SEP 01 1990

SC-API-6305

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant's Response to Request for Production was forwarded by certified mail, return receipt requested or by overnight mail Joseph P. Blanks, Reaud, Morgan & Quinn, 909 Laurel Street, Beaumont, Texas 77701 and Herschel L. Hobson, 2190 Harrison, Beaumont, Texas 77701 and to all other counsel of record by regular mail on this 31 day of August, 1990.


William E. Schweinle, Jr.

2787L/75-77.

012063

RESPONSE TO REQUEST FOR PRODUCTION

Request for Production No. 1: Please produce a copy of your document retention policies this Defendant has used since it began such a policy, but not before 1945. This request seeks sufficient information to determine when a document retention policy began (or if one existed in 1945) what each policy was and each change and when each change became effective.

Response: Please see attached copy of six-page document dated August 23, 1976 and entitled Policy Number: 804 as well as an eight page document dated August 15, 1983 and designated as API Policy Number: 804. The foregoing documents comprise all of the documents responsive to this request.

012070