

JM Johns-Manville RECEIVED Internal Correspondence

To: File

APR 04 1979

Date: 4/4/79

PLAINTIFF'S
EXHIBIT

JMMC-149

LEGAL DEPARTMENT

From: W. R. Curtner

Copies: J. Drake 2-16 J. Green 2-18
P. Jackiewicz c, f-Gen'l W/C and Tex. Employers -Plants (3)

Subject: Texas - Workers' Compensation Insurance Coverage

All three JM plants in Texas were relatively recently built:

Denison 1958
Cleburne 1964
Ft. Worth 1952

These plants were insured by Texas Employers' Insurance Association for Workers' Compensation up until 7/1/61 at which time our Texas plants were placed under the Travelers policy.

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To: Memo to File

Date: May 9, 1980

From: Barbara Diemer

Copies:

Subject: FLATT VS. J-M (Texas)

Recently, it became necessary to locate sales records of Transite pipe sales to East Texas Salt Water Disposal Company.

I contacted Joe Fennessey at WHQ, Marketing Manager - Industrial Accounts - Transite. He told me that they have no customer files here. For computer sales records, contact Physical Distribution, Mr. Hank Leopwitz, ext. 2474. I also contacted Ed Spinzig at WHE in the Pipe Division.

Contacts at Denison, TX Pipe Plant, speed #941:

Ernie Pronski, Manager

Wayne Wagner

Jeri Petrus - Customer Service

They have excellent records filed alphabetically by customer name in their morgue going back to 1958 when the Denison plant was opened. Prior sales in the territory might have been made by Marrero, LA; however, they ceased manufacturing Transite pipe there in 1970. The speed # at Marrero is 945. I talked with J. E. Smith, Manager of the plant since February 1979. He states that no files exist there prior to 1969.

They gave me the name of a former District Sales Manager in that area who is now retired:

W. P. (Pat) Richardson
229 Brockenbraugh Ct.
Metairie, LA
(504)835-8012

Also, he stated that it was possible that sales in the area might have been made from either Waukegan or Green Cove Springs prior to the opening of the Denison plant.

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The Denison plant searched its records back to 1958 and found records dating back to 1971 of sales to East Texas Salt Water Disposal Company, which they forwarded to us. Copies of all records were produced in the Flatt (TX) case with the exception of correspondence, which they had also forwarded.

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