

COPY

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

KENNETH GRIMM, Personal
Representative of the ESTATE
OF HELEN GRIMM, Deceased,

Plaintiff,

Case No. 83-2872-NO

vs.

HONORABLE RAYMOND R. CASHEN

FORD MOTOR COMPANY, a Foreign
Corporation, UNION CARBIDE
CORPORATION, a Foreign Corporation,
DIAMOND SHAMROCK CORPORATION, a
Foreign Corporation, STAUFFER
CHEMICAL COMPANY, a Foreign
Corporation, TENNECO, INC., a
Foreign Corporation, TENNECO
CHEMICALS, INC., a Foreign
Corporation, UNIROYAL, INC., a
Foreign Corporation, ALLIED CHEMICAL
CORPORATION, a Foreign Corporation,
HOOKER CHEMICALS & PLASTICS CORP.,
a Foreign Corporation, FIRESTONE
TIRE & RUBBER COMPANY, a Foreign
Corporation, B. F. GOODRICH COMPANY,
a Foreign Corporation, GOODYEAR
TIRE & RUBBER COMPANY, a Foreign
Corporation, Jointly and Severally,

Defendants.

FRANCIS P. HUGHES (P15236)
Attorney for Plaintiff

RALPH W. BARBIER, JR. (P10422)
Attorney for Defendant -
B.F. GOODRICH COMPANY

ANSWERS TO DEFENDANT, B. F. GOODRICH'S, INTERROGATORIES

NOW COMES the Plaintiff, KENNETH GRIMM, Personal
Representative of the ESTATE of HELEN GRIMM, Deceased, by and
through his attorneys, BEBOUT, POTERE, COX & HUGHES, P.C., and
for his answers to interrogatories of Defendant, B. F. Goodrich, says
as follows:

1. Helen Ramsey
50877 Fairchild
Mt. Clemens, Michigan

Date of Birth: May 22, 1926

BEBOUT, POTERE, COX & HUGHES, P.C.

ATTORNEYS AT LAW
MEADOWBROOK PROFESSIONAL PLAZA
1000 WEST UNIVERSITY DRIVE
ROCHESTER, MICHIGAN 48063
851-4114

UHL 09664

BEBOUT, POTERE, COX & HUGHES, P.C.
ATTORNEYS AT LAW
HEADQUARTER PROFESSIONAL PLAZA
1000 WEST UNIVERSITY DRIVE
ROCHESTER, MICHIGAN 48063
651-4114

2. Unknown. 227-24-6713

3. Dr. Scott, Mt. Clemens, Michigan - General Sickness
Dr. Wilson, Mt. Clemens, Michigan - General Sickness
Dr. Eudoro Coello, St. Clair Shores, Michigan - 1979 - Cancer
Dr. Yap, address unknown - 1978 - Cancer
Dr. B. Pisick, Detroit, Michigan - 1980 - Cancer
Dr. Robert Ambrose, Grosse Pointe, Michigan - 1980 - Cancer
Dr. H. Schaefer, Grosse Pointe, Michigan - 1978 - Cancer
Dr. Frank Walker, Grosse Pointe, Michigan - 1978 - Cancer
Dr. Mahmood Zadegan, Grosse Pointe, Michigan - 1978 - Cancer
Dr. A. Christie, Grosse Pointe, Michigan - 1977 - Cancer
Dr. D. H. Barker, Grosse Pointe, Michigan - 1977 - Cancer
Dr. G. Hardy, Detroit, Michigan - 1980 - Cancer
Dr. J. Ling, Detroit, Michigan - 1977 - Cancer
Dr. P. T. Mulligan, Mt. Clemens, Michigan - Cancer

Together with several doctors, the identity of which are unknown, who attended the decedent for child birth from 1946 - 1962, the last attending physician being Dr. William Simes, Mt. Clemens, Michigan.

4. St. Joseph Hospital, Mt. Clemens, Michigan - 1952 and 1962 for childbirth. 1977 - Removal of breast tumor.

Cottage Hospital, Grosse Pointe Farms, Michigan - 1977 to 1980 - Cancer.

St. Johns Hospital, Detroit, Michigan - 1977 - Cancer

Sargatoga General Hospital, Detroit, Michigan - 1980 - Cancer

Kingsport Hospital, Kingsport, Tennessee - 1946 - Childbirth

5. See attached Medical Records.
6. See attached Medical Records.
7. See attached Medical Records, which are self explanatory.
8. a. See answer to Question No. 2.
b. Housewife only.
c. - f. N/A
9. No.
10. No.
11. No.
12. a. Kenneth Grimm
50877 Fairchild
Mt. Clemens, Michigan
b. Gate City, Virginia
12-18-42
c. Brenda Aitken
December 11, 1946 - 37 years old

Deborah Patterson
September 3, 1950 - 33 years old

URL 09665

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Kathy Spear
October 30, 1952 - 31 years old

Michael Grimm
January 8, 1962 - 22 years old

d. 38281 Townhall Road
Mt. Clemens, Michigan

681 Helen Drive
Allenton, Michigan

181 Lafayette
Mt. Clemens, Michigan

225 N. Wilson
Mt. Clemens, Michigan

13. N/A
14. See answer to Question No. 12.
15.
 - a. Dungannon High School
 - b. Scott City, Virginia
 - c. 1939 - 1941
 - d. None
16. None.
17.
 - a. Cancer
 - b. Approximately 3 - 4 years
 - c. Disability because of treatment for cancer.
18. No.
19. N/A
20. See attached Medical Records.
21. Plaintiff will provide all bills forthwith.
22. N/A
23. Not to my knowledge.
24. N/A
25. Plaintiff is unable to answer said interrogatories with specificity until discovery is completed.
26. Other than medical records and the members of decedent's immediate family, Plaintiff is unable to answer said interrogatories with specificity until discovery is completed.
27. Other than treating doctors and members of decedent's immediate family, Plaintiff is unable to answer said interrogatories with specificity until discovery is completed.
28. All of the living cancer victims and families of deceased victims listed in the Detroit News newspaper articles on the cancer problem in the neighborhood lying immediately east of the Ford Motor Company Vinyl Plant on Groesbeck Highway, Mt. Clemens, Michigan. (Newspaper article dates 1979 to 1981, Detroit News)

JRL 09666

29. Not yet.

30. Other than the treating physicians named herein, Plaintiff has not yet selected any expert witnesses.

31. See answer to question No. 30.

32. B. F. Goodrich was previously identified by Defendant, Ford Motor Company, as a supplier of such chemicals in U.S. District Court, Eastern District of Michigan, Southern Division, Civil Action No. 78-70769.

Dated: July 7, 1984

Kenneth Grimm

STATE OF MICHIGAN

COUNTY OF OAKLAND

ss

On this 7th day of July, A.D., 1984, before me personally appeared the above-named KENNETH GRIMM, to me known to be the person in and who executed the foregoing under oath and as his free act and deed and knows the contents therein contained to be true based upon information, knowledge and belief.

Beverly J. Nieuwkoop, Notary Public
Oakland County, Michigan
My Commission Expires: 12/3/86

CERTIFICATE OF MAILING

I certify that a copy of the above instrument was served upon the attorneys of record in the above case by mailing it to the attorneys at their business addresses as disclosed by the pleadings of record, with prepaid postage on the envelope on 7/10/84.

Beverly J. Nieuwkoop

BEBOUT, POTERE, COX & HUGHES, P.C.
ATTORNEYS AT LAW
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