

IL036E.ASB
10/27/94

PLAINTIFF'S EXHIBIT

K-1986

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF MC LEAN

GEORGE and MYRA KROUTIL,	)	
Plaintiffs,	)	
v.	)	No. 94 L 14
OWENS-CORNING FIBERGLAS CORPORATION,	)	
et al,	)	
Defendants.	)	

DEFENDANT, OWENS-ILLINOIS, INC.'S ANSWERS TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES

PRELIMINARY STATEMENT

Some of the events which may be relevant to the matters inquired about by Plaintiffs' Interrogatories apparently occurred more than thirty-five years ago. In addition, effective April 30, 1958, Owens-Illinois, Inc. disposed of the business involved in this action by way of sale of that business to Owens-Corning Fiberglas Corporation. Since that time, Owens-Illinois, Inc. has not engaged in the asbestos-containing insulation products manufacturing business. It does not now and it has not since that sale manufactured, distributed or sold any of its Kaylo asbestos-containing insulation products. As a result of the foregoing factors, many of the individuals who might have had personal knowledge of the matters to which plaintiffs' interrogatories relate are deceased, or are otherwise unavailable to Owens-Illinois, Inc., and investigations to date indicate that at least some documents which relate to matters inquired about by these interrogatories were transferred to Owens-Corning Fiberglas Corporation with the transfer of the business in question in 1958. Owens-Illinois, Inc. is engaged in a continuing investigation in an attempt to locate, confirm the transfer of, or confirm the absence of, such documents and is also engaged in a continuing investigation into the matters inquired about in these interrogatories. Unless otherwise stated in an answer to a

Willis G. Hazard: 2/11/81, 3/27/81, 12/14/81,
and 1/27/82.

Howard G. Bruss, Esq.: 6/29/93.

David Van Hooser: 8/11/93 (trial)

Michael E. McConnell, Esq.: 2/24/89 and
10/25/90.

Richard R. Beck: 4/1/81.

Samuel F. Schillaci: 4/7/81, 7/31/81 (trial),
11/9/81 (trial), 11/17/81 (trial), 4/26-27/82,
6/4/84, 8/28/84, 9/6/84, 11/14/84, 2/5/85,
3/4/85 (trial), 4/30/85, 12/19/85 (trial),
10/8/86, 4/10/87 (trial), 6/25/87 (trial),
11/4/87 (trial), 1/20/88, 9/20/88 (trial),
10/15/88 (trial), 11/14/88 (trial), 11/22/88
(trial), 11/29/88 (trial), 12/8/88 (trial),
12/15/88 (trial), 3/14/89, 3/21/89, 3/28/89
(trial), 5/9/89 (trial), 6/15/89, 6/30/89
(trial), 7/7/89 (trial), 7/27/89, 8/18/89
(trial), 11/2/89 (trial), 11/6/89, 11/16/89
(trial), 11/17/89 (trial), 1/9/90 (trial),
1/31/90 (trial), 2/23/90 (trial), 3/14/90,
4/17-18/90, 4/24/90, 5/16/90 (trial), 5/24/90
(trial), 5/30/90 (trial), 6/8/90 (trial),
6/12/90 (trial), 6/20/90 (trial), 6/21/90
(trial), 6/29/90 (trial), 7/17/90 (trial),
7/19/90 (trial), 8/30/90 (trial), 10/11/90
(trial), 10/17/90, 11/20/90 (trial), 11/28/90
(trial), 12/11/90 (trial), 12/19/90 (trial),
1/24/91 (trial), 2/1/91 (trial), 2/22/91
(trial), 2/27/91, 3/8/91 (trial), 4/25/91
(trial), 4/26/91 (trial), 5/20/91 (trial),
6/13/91 (trial), 8/2/91 (trial), 8/8/91
(trial), 9/30/91 (trial), 10/8/91 (trial),
10/25/91 (trial), 10/30/91 (trial), 10/31/91
(trial), 11/4/91 (trial), 11/7/91 (trial),
11/13/91 (trial), 1/23/92 (trial), 1/28-29/92
(trial), 2/24/92 (trial), 12/15/92 (trial),
3/11/93 (trial), 3/12/93 (trial), 3/19/93
(trial), 5/21/93 (trial), 8/16/93 (trial), and
2/2/94 (trial).

George N. Bates, M.D.: 4/6/81.

Thomas A. Meehan, Esq.: 8/3/81 (trial),
11/9/81 (trial), 12/15/83, 1/16/84, 8/28/84,
6/4/84, and 11/13/84.

AFFIDAVIT

STATE OF OHIO)

)SS:

COUNTY OF WOOD)

H. G. BRUSS, being duly sworn according to law, deposes and says that he is an Assistant Secretary of Owens-Illinois, Inc., a defendant herein; that as such he is authorized to make an Affidavit on its behalf; and that the facts set forth in the foregoing DEFENDANT, OWENS-ILLINOIS, INC.'S ANSWERS TO INTERROGATORIES, are true and correct to the best of his knowledge, information and belief.

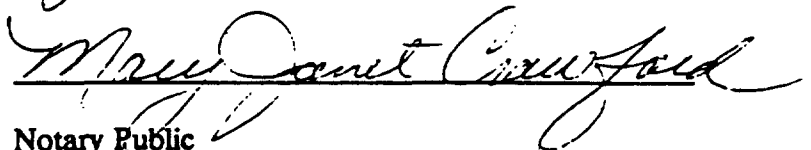


H. G. BRUSS

SWORN TO and subscribed before me this 10th day of September, 1994

My Commission Expires: January 7, 1996

SEAL



Notary Public

MARY JANET CRAWFORD
Notary Public, State of Ohio
My Commission Expires 1-7-96