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SUPERIOR COURT OF CALIFORNIA - COUNTY OF SOLANO

In re:

**SOLANO COUNTY COMPLEX
ASBESTOS LITIGATION,**

No. 2830

**DEFENDANT CHRYSLER CORPORATION'S RESPONSES TO PLAINTIFFS'
STANDARD INTERROGATORIES TO DEFENDANT PURSUANT
TO GENERAL ORDER 30.00**

Propounding Party : Plaintiffs

Responding Party : Defendant Chrysler Corporation

Set Number : One

Defendant Chrysler Corporation (Chrysler) provides the
following responses to plaintiffs' interrogatories, both for
itself and as successor in interest to American Motors
Corporation (AMC):

GENERAL RESPONSE

These interrogatories have little to do with the issues involving Chrysler or AMC in any particular lawsuit, and thus, by their nature, far exceed the scope of the allegations in any complaint against Chrysler or AMC. Chrysler and AMC, therefore, object to these interrogatories as being grossly overbroad, oppressive, harassing, shotgun, designed to seek information that is neither relevant nor reasonably calculated to lead to the discovery of relevant information, and an undue burden upon Chrysler and AMC.

These interrogatories are also objected to to the extent that they call for information protected by the attorney-client and/or work product privileges.

Furthermore, the following specific responses are based upon Chrysler's current knowledge of the facts inquired into in these interrogatories. Due to the remote nature of many of these facts, the changes in Chrysler's and AMC's corporate structure over the years, and the limited extent of existing or available records, Chrysler is supplying information based upon preliminary investigation, and as such, these responses may contain information that is neither complete nor reliable. Therefore, Chrysler expressly reserves the right to supplement

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1 or modify these responses as additional information is
2 discovered.

3
4 Chrysler responds to these interrogatories without
5 waiving any of the general or specific objections stated. These
6 general objections are explicitly incorporated into each of the
7 specific responses set forth below.

8
9 SPECIFIC RESPONSES

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11 RESPONSE TO INTERROGATORY NO. 1:

- 12 a. Robert D. Maples;
13 b. 12000 Chrysler Drive, Highland Park, Michigan
14 48288-1919;
15 c. Claims Supervisor;
16 d. Mr. Maples has been a Claims Supervisor since
17 he began his employment with Chrysler in 1984.

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19 RESPONSE TO INTERROGATORY NO. 2: Yes.

- 20 a. Chrysler Corporation;
21 b. Delaware;
22 c. 1925;

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d. 12000 Chrysler Drive, Highland Park, Michigan
48288-1919;

e. Not applicable.

RESPONSE TO INTERROGATORY NO. 3: Before 1986,
Chrysler was known as Chrysler Corporation. Chrysler underwent
a corporate reorganization in 1986 and began doing business as
Chrysler Motors Corporation. On January 1, 1990, Chrysler
resumed doing business as Chrysler Corporation. Chrysler is the
successor in interest to AMC.

RESPONSE TO INTERROGATORY NO. 4: Chrysler has been
qualified to do business in California since approximately 1925.

RESPONSE TO INTERROGATORY NO. 5: Since 1925, Chrysler
has manufactured automobiles that included asbestos containing
products.

RESPONSE TO INTERROGATORY NO. 6: No.

RESPONSE TO INTERROGATORY NO. 7: No.

RESPONSE TO INTERROGATORY NO. 8: Yes.

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1 a. Since 1925 Chrysler has manufactured
2 automobiles that have included asbestos containing
3 products. It has also marketed replacement parts
4 under the names Mopar, Cycle-Weld, and Cycle-Bond;

5 b. Chrysler began marketing automobiles that
6 included asbestos containing products in 1925;

7 c. Chrysler currently markets vehicles that
8 include asbestos containing products;

9 d. Chrysler believes that brake linings it has
10 distributed contained 50 percent, by weight,
11 chrysotile asbestos fiber; however, it is unaware of
12 the specific compositions of the asbestos containing
13 friction products purchased from outside suppliers.

14 e. Brake linings, clutch facings, transmission
15 bands, and heat resistant gaskets and seals;

16 f. Chrysler brake linings have had the Chrysler
17 logo stamped on them;

18 g. See Response to Interrogatory No. 8(e);

19 h. Chrysler has distributed asbestos containing
20 friction products manufactured by the following:
21 Abex, Bendix, Chrysler, Raybestos-Manhattan, and
22 Johns-Manville.

23 AMC sold asbestos containing friction
24 products manufactured by the following:
25 Bendix Corporation, Kelsey-Hayes, Borg and
26

1 Beck, Dana, Valeo, Wagner Electric, Abex,
2 and OEM;

3 i. Chrysler has purchased asbestos fiber from
4 Asbestos Corporation, Limited 830 Mooney Street,
5 Bentford Mines, Quebec, Canada G6651; Carry Canadian
6 P.O. Box 190, East Braughton Station, PQ, Canada
7 GON IHO; Johns-Manville P.O. Box 5108, Ken Caryl
8 Ranch, Denver, Colorado 80217;

9 AMC did not purchase raw asbestos for
10 incorporation into its vehicles;

11 j. Unknown.

12
13 RESPONSE TO INTERROGATORY NO. 9: No.

14
15 RESPONSE TO INTERROGATORY NO. 10: No.

16
17 RESPONSE TO INTERROGATORY NO. 11: No.

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19 RESPONSE TO INTERROGATORY NO. 12: No.

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21 RESPONSE TO INTERROGATORY NO. 13: No.

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23 RESPONSE TO INTERROGATORY NO. 14: No.

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1 RESPONSE TO INTERROGATORY NO. 15: Yes.

2 a. Chrysler's Trenton Chemical Plant
3 Trenton, Michigan.

4
5 RESPONSE TO INTERROGATORY NO. 16:

6 a. 1959

7 b. 1988

8 c. Chrysler manufactured brake linings at its
9 Trenton Plant.

10
11 RESPONSE TO INTERROGATORY NO. 17: No.

12
13 RESPONSE TO INTERROGATORY NO. 18: No.

14
15 RESPONSE TO INTERROGATORY NO. 19: No.

16
17 RESPONSE TO INTERROGATORY NO. 20: No.

18
19 RESPONSE TO INTERROGATORY NO. 21: No.

20
21 RESPONSE TO INTERROGATORY NO. 22: Since 1925,
22 Chrysler has sold through dealerships in northern California,
23 thousands of automobiles that included asbestos containing
24 products. Thus, Chrysler is unable to respond to this
25 interrogatory due to its extremely broad scope and vague and
26 ambiguous nature.

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1 RESPONSE TO INTERROGATORY NO. 23: See Response to
2 Interrogatory No. 22.

3
4 RESPONSE TO INTERROGATORY NO. 24: Chrysler's outside
5 counsel in this matter, CROSBY, HEAFEY, ROACH & MAY, 1999
6 Harrison St., Oakland, CA 94612, has some exemplars of Chrysler
7 advertising.

8
9 RESPONSE TO INTERROGATORY NO. 25:

10 a. 12000 Chrysler Drive, Highland Park, Michigan
11 48288;

12 b. R. A. Houtman, Assistant Secretary, Chrysler
13 Corporation, 12000 Chrysler Drive, Highland Park,
14 Michigan 48288.

15
16 RESPONSE TO INTERROGATORY NO. 26: Not applicable.

17
18 RESPONSE TO INTERROGATORY NO. 27: Not applicable.

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20 RESPONSE TO INTERROGATORY NO. 28: Original equipment
21 parts were distributed in new Chrysler automobiles. Authorized
22 Chrysler replacement parts were distributed in cardboard boxes.

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1 From 1988 to the present the cartons for Chrysler's
2 asbestos containing replacement parts have contained the
3 following warning:

4
5 DANGER

6
7 CONTAINS ASBESTOS FIBERS

8 AVOID CREATING DUST

9 CANCER AND LUNG DISEASE

10 HAZARD

11
12 With respect to the authorized asbestos-containing
13 replacement parts distributed by AMC, warnings placed on cartons
14 in 1980 read as follows:

15
16 CAUTION, AVOID CREATING DUST.

17 BREATHING ASBESTOS MAY CAUSE BODILY HARM

18
19 In 1981, AMC changed its warning to the following:

20
21 CAUTION, CONTAINS ASBESTOS FIBERS.

22 AVOID CREATING DUST. BREATHING ASBESTOS

23 DUST MAY CAUSE SERIOUS BODILY HARM.

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1 RESPONSE TO INTERROGATORY NO. 33: Yes. The following
2 warnings first appeared in Chrysler's 1984 Service Manuals:
3

4 CAUTION: When servicing brake
5 assemblies or components, do not create dust
6 by sanding, grinding or by cleaning brake
7 parts with a dry brush or with compressed
8 air. A water dampened cloth should be used.
9 Many brake components contain asbestos
10 fibers which can become airborne if dust is
11 created during service operations.
12 Breathing dust which contains asbestos
13 fibers can cause serious bodily harm.
14

15 CAUTION: When servicing clutch
16 assemblies or components do NOT create dust
17 by sanding or by cleaning clutch parts with
18 a dry brush or with compressed air. (A
19 water dampened cloth should be used). The
20 clutch disc contains "Asbestos Fibers" which
21 can become airborne if dust is created
22 during service operations. Breathing dust
23 containing "Asbestos Fibers" may cause
24 serious bodily harm.
25 - - - - -
26 - - - - -

1 The following warning first appeared in the 1978 AMC
2 Technical Service Manual which was published and distributed in
3 1977:

4
5 BRAKESHOE REPLACEMENT WARNING: When
6 servicing wheel brake parts, do not create
7 dust by grinding or sanding brake linings or
8 by cleaning brake parts with a dry brush or
9 compressed air. Use water dampened cloths
10 only to remove dirt and dust from brake
11 parts prior to disassembly. Many brake
12 parts contain asbestos fibers which can
13 become airborne if dust is created during
14 service operations. Breathing dust
15 containing asbestos fibers may cause serious
16 bodily harm.

17
18 RESPONSE TO INTERROGATORY NO. 34: Chrysler is unable
19 to respond to this interrogatory because of the grossly
20 overbroad and oppressive scope of the information requested, and
21 the vague and ambiguous nature of the interrogatory. In
22 addition, since there are no Chrysler employees or contract
23 units in Solano County alleging that Chrysler is liable for
24 their asbestos exposure injuries, this interrogatory is seeking
25 information that is neither relevant nor calculated to lead to
26 the discovery of relevant information.

RESPONSE TO INTERROGATORY NO. 35: Gerald A.

Sattelmeier has been Chrysler's manager of Industrial Hygiene since 1976.

RESPONSE TO INTERROGATORY NO. 36:

(1) On December 8, 1983, James Knoll was deposed in Vaughn v. Raymark Industries, et al., Civil Action No. 82-1655-C(A) in the United States District Court for the Eastern District of Missouri, Eastern Division with Walter L. Floyd appearing for plaintiffs. On June 15, 1984 Mr. Knoll was deposed in Horn v. Bendix Corp., Civil Action No. 80-2-09935-3 Washington State, King County Superior Court with Thomas H. Hart III appearing for plaintiffs. On June 29, 1987, Mr. Knoll was deposed in Webb v. Celotex Corp., et al., Michigan State, County of Wayne with JoAnn Carlson appearing for plaintiffs. Mr. Knoll was also deposed on June 14, 1988 in Coates v. Raymark Industries, et al., Civil Action No. L-095651-85 in the Superior Court of New Jersey, Middlesex County with Angelo J. Cifaldi appearing for plaintiffs.

(2) On July 15, 1986 Gerald A. Sattelmeier was deposed in Boatnar v. Chrysler Corporation et al., in the Circuit Court for the County of Wayne in the State of Michigan. Plaintiffs were represented by Joseph F.

1 Bruegger. Mr. Sattelmeier was also deposed on
2 March 9, 1989 in Coates v. Raymark Industries, et al.
3 Plaintiffs were represented by Angelo Cifaldi.

4 (3) On June 14, 1988 Jack L. Koblin was deposed in
5 Coates v. Raymark Industries, et al., in the Superior
6 Court of New Jersey, Middlesex County. Plaintiffs
7 were represented by Angelo Cifaldi.

8 (4) On June 14, 1988 Paul D. Kelly, Jr. was deposed in
9 the case of Coates v. Raymark Industries, et al., with
10 Angelo Cifaldi appearing for plaintiffs. On June 15,
11 1988 Mr. Kelly was deposed in Becker v. Baron
12 Brothers, No. L-91267-85 in the Superior Court of New
13 Jersey, Middlesex County. Plaintiffs were represented
14 by Francis A. Tomes.

15 (5) On December 15, 1983, Stanley V. Puidokas and
16 Richard J. Wirth were deposed in Dorothy St. Jacque,
17 et al. v. Johns-Manville Corp., C 137, 465 in
18 Philadelphia, Pennsylvania.

19
20 RESPONSE TO INTERROGATORY NO. 37: Chrysler and/or,
21 Chrysler employees have had memberships in the American
22 Industrial Hygiene Foundation, the National Safety Council, the
23 Friction Material Safety Institute, and the Motor Vehicle
24 Manufacturers Association.

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1 RESPONSE TO INTERROGATORY NO. 38: Chrysler and/or
2 Chrysler employees have received the IHF Digest.

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4 RESPONSE TO INTERROGATORY NO. 39: No.

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6 RESPONSE TO INTERROGATORY NO. 40: Yes. Chrysler has
7 had a library in Highland Park, Michigan.

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9 RESPONSE TO INTERROGATORY NO. 41: No.

10
11 RESPONSE TO INTERROGATORY NO. 42: No.

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13 RESPONSE TO INTERROGATORY NO. 43: Since there are no
14 individuals in Solano County alleging exposure to asbestos on
15 the facility identified in Interrogatory Response No. 15, this
16 interrogatory is seeking information that is neither relevant
17 nor calculated to lead to the discovery of relevant information,
18 and thus it is unduly burdensome and oppressive.

19
20 RESPONSE TO INTERROGATORY NO. 44: Not to the best of
21 Chrysler's knowledge at this time.

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23 RESPONSE TO INTERROGATORY NO. 45: Not to the best of
24 Chrysler's knowledge at this time.

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1 RESPONSE TO INTERROGATORY NO. 46: There is no
2 Interrogatory No. 46 in this set.

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4 RESPONSE TO INTERROGATORY NO. 47: See Response to
5 Interrogatories Nos. 32 and 33.

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7 RESPONSE TO INTERROGATORY NO. 48: Since there are no
8 individuals in Solano County who produced any of Chrysler's
9 asbestos containing products who are alleging asbestos exposure
10 due to this activity, this interrogatory is seeking information
11 that is neither relevant nor calculated to lead to the discovery
12 of relevant information. However, Chrysler has never required
13 the mechanics who worked on its automobiles to wear respirators.

14
15 RESPONSE TO INTERROGATORY NO. 49: No.

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17 RESPONSE TO INTERROGATORY NO. 50: Yes. Chrysler was
18 first notified of such a claim in the complaint in the case of
19 Friedman v. General Motors Corp., et al.

20
21 RESPONSE TO INTERROGATORY NO. 51: Chrysler does not
22 categorize its documents regarding workers' compensation claims
23 according to the type of injury to its employees. Since
24 Chrysler has had thousands of employees and there have been
25 numerous workers' compensation claims stemming from their
26

1 employment, this interrogatory is objected to as being
2 oppressive, overly broad, and unduly burdensome.

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4 RESPONSE TO INTERROGATORY NO. 52: See Response to
5 Interrogatory No. 51.

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7 RESPONSE TO INTERROGATORY NO. 53: Chrysler has
8 sufficient assets to respond to claims for damages.

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10 RESPONSE TO INTERROGATORY NO. 54: No.

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12 RESPONSE TO INTERROGATORY NO. 55: No.

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14 RESPONSE TO INTERROGATORY NO. 56: There is no
15 Interrogatory No. 56 in this set.

16
17 RESPONSE TO INTERROGATORY NO. 57: No.

18
19 DATED: August 14, 1990.

20
21 CROSBY, HEAFY, ROACH & MAY
22 Professional Corporation

23
24 By


J. David Bickham
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Chrysler Motors Corporation