

FILE NAME: WR Grace (WRG)

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WR GRACE 5/9/91

INTERROGATORY 18

For each piece of equipment identified in answer to Interrogatory No. 9(c), describe what, if any tests were made to determine the safety of said equipment and:

- (a) State when and where each such test was made;
- (b) Describe the results of each such test;
- (c) Identify each individual who participated therein and describe in detail the extent of his participation;
- (d) Identify each document which reflects, refers or relates to any information set forth in answer to this interrogatory;
- (e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

ANSWER 18

Not applicable.

INTERROGATORY 19

For each label, brochure, or other written material describing or relating to the use of each product identified in answer to Interrogatory No. 1, produced by you or any person associated with you or any related company or association;

- (a) Describe its contents;
- (b) State when, where, how and to whom it was distributed;
- (c) State the manner in which it was placed on or in the product container or whether it was separate from the product container, or whether it was separate from the product or container;
- (d) State whether any written, printed or graphic matter was present to warn of any harmful ingredient it might contain. If so, state:
 - i. Whether a signal word, i.e. "danger", "warning" or "caution" was present;
 - ii. Whether the signal word was printed in boldface, capital letters or different colored inks. Which?
 - iii. The wording of the statements describing any hazard;

CAUTION
AVOID CREATING DUST
BREATHING DUST MAY BE HARMFUL TO YOUR HEALTH
USE WITH ADEQUATE VENTILATION
OR WITH RESPIRATORY PROTECTION

Relevant, non-privileged and non-trade secret documents containing information responsive to this interrogatory will be made available to the plaintiffs in Boston, Massachusetts at a mutually agreeable time.

INTERROGATORY 20

For each product identified in answer to Interrogatory 1 state whether warnings of any harmful or potentially harmful effects of the product were printed on the cartons or packing cases in which individual containers were packed and, if so:

- (a) State the printed warning's contents;
- (b) State when the warning was used;
- (c) Describe the manner in which it was placed on or in the product container;
- (d) Identify each individual who participated in writing of the label or brochure and describe in detail the extent of his participation;
- (e) Identify each document which reflects, refers or relates to the information contained on the cartons or packing cases and the decision to include that information;
- (f) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state full substance of the information supplied.

ANSWER 20

Grace-Conn objects to this interrogatory on the grounds that it is vague and ambiguous in that terms such as "warning" and "potentially harmful" are undefined and subject to various interpretations. Grace-Conn further objects to this interrogatory on the grounds that it improperly implies that the use of Grace-Conn products had any health consequences for users.

Subject to these objections and to the General Objections interposed above, Grace-Conn states see also the answer to Interrogatory No. 19, above.