

IN RE: BRIDGEPORT ASBESTOS LITIGATION

DOCKET NUMBER BA 02-0395839S

SUPERIOR COURT

STEPHEN HALEY, ET AL

J.D. OF FAIRFIELD

VS

AT BRIDGEPORT

ACANDS, INC., ET AL

EXHIBIT

WK CC 5006

CRANE CO.'S RESPONSES TO PLAINTIFFS' INTERROGATORIES

Crane Co. hereby files the following responses to Plaintiffs' Interrogatories as follows:

**PRELIMINARY STATEMENT/GENERAL OBJECTIONS/
RESERVATION OF RIGHTS**

A. The following responses are based upon the information that is presently known and reasonably available to Crane Co. Crane Co. believes these responses are accurate as of the date made. Many matters inquired about in Plaintiffs' Interrogatories ("Discovery Requests") took place decades ago. Due to the passage of time, information may be incomplete or no longer available. Moreover, information sought in the Discovery Requests may be contained in documents housed in various document repositories. Due to the time and expense involved, it would not be practical to review all of those documents in connection with preparing responses to the Discovery Requests. Nevertheless, Crane Co. has endeavored to investigate all relevant facts and circumstances. The following answers are based upon its investigation. Crane Co. cannot exclude the possibility that its continued investigation may reveal more complete information. Crane Co.'s investigation into the matters inquired into in these Discovery Requests continues. The investigation is dependent upon locating knowledgeable individuals and relevant documents. No finite completion date can be placed upon those

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efforts. Crane Co. has made a reasonable effort to answer these Discovery Requests to the best of its present knowledge, information, and belief.

B. Crane Co. objects to the Discovery Requests to the extent they (1) are unduly burdensome and overbroad, or (2) seek information that is not relevant to this lawsuit and that is not reasonably calculated to lead to the discovery of admissible evidence. Information not presently known to or readily ascertainable by Crane Co. may be located in various document repositories Crane Co. maintains. Crane Co. has not reviewed the documents stored at those locations, because the expense involved with such an effort would be prohibitive and unduly burdensome. The documents located at the repositories are not organized; and Crane Co. is not able to ascertain whether any documents located within the repositories contain information responsive to the Discovery Requests. The repositories, however, contain numerous documents that are not responsive to the Discovery Requests and which, Crane Co. presumes, may be protected by the attorney-client privilege, the work product doctrine, and/or other applicable privileges and/or protections. Should plaintiffs wish to review the documents located at any of the repositories, Crane Co. will make certain of those documents available to plaintiffs if plaintiffs agree, in writing, that (i) Crane Co. has not waived any objections it may have with respect to the discoverability of those documents on any ground, all of which objections are expressly reserved, and (ii) Crane Co. may conduct a post-designation review to remove privileged and irrelevant documents from any collection of documents that may be copied for production to plaintiffs, even if plaintiffs had specifically designated the privileged or irrelevant documents for copying. The burden of obtaining

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responsive information from those documents is the same for plaintiffs as it is for Crane Co.

C. Crane Co. does not concede that any of its answers to the Discovery Requests are or will be admissible evidence at a trial of this action. Crane Co. does not waive any objection on any ground, whether or not asserted herein, to the use of any such answer at trial.

D. The foregoing Preliminary Statement and General Objections are incorporated by reference into each of the responses provided hereinafter.

PLAINTIFFS' INTERROGATORIES

Q1. Identify the registered name of the answering defendant as well as all prior names or predecessor entities by which the defendant has existed.

a. For each give the current or past address, where applicable, and the state of incorporation and whether or not it is an active corporation.

A1. Subject to the foregoing General Objections, Crane Co. is a corporation that was originally incorporated in Illinois in or about 1865. In 1985, Crane Co. was reincorporated in Delaware. Its headquarters are located at 100 First Stamford Place, Stamford, Connecticut 06902. Further information requested by this Interrogatory may be obtained by reviewing Crane Co.'s annual reports, copies of which will be made available to plaintiffs at mutually agreeable time and place.

Q2. Set forth the full and correct name, the principal place of business and the state and date of incorporation of the answering defendant.

A2. Subject to the foregoing General Objections, Crane Co. is a corporation that was originally incorporated in Illinois in or about 1865. In 1985, Crane Co. was reincorporated in Delaware. Its headquarters are located at 100 First Stamford Place, Stamford, Connecticut 06902.

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Q3. Identify all divisions, subsidiaries or affiliated companies of the answering defendant. For each entity state whether or not it ever has or presently engages in any phase of mining, manufacturing, sale, supply, distribution, or design of asbestos or asbestos-containing products or materials.

A3. Crane Co. objects to this Interrogatory on the grounds that it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence because it requests information regarding subsidiaries and affiliated companies, not Crane Co., the named party in the action. Subject to and without waiving the foregoing objections, information sought by this Interrogatory may be obtained from Crane Co.'s annual reports, copies of which will be made available to plaintiffs at a mutually agreeable time and place.

Q4. State the name, present business address, present residence, and capacity or title of the individual signing these Interrogatories on behalf of the answering defendant.

A4. Subject to the foregoing General Objections, Crane Co.'s responses are being verified by Anthony Pantaleoni, Vice President Environment, Health & Safety, Crane Co., 100 First Stamford Place, Stamford, Connecticut 06902 .

Q5. Has this defendant or any division, subsidiary or company listed in No. 3, ever conducted business in the states of Connecticut, Rhode Island, Maine, New Hampshire, Vermont, Massachusetts, (hereinafter referred to collectively as "New England") as well as New York and/or New Jersey, at any time from 1930 to present. If so, please state the inclusive dates during which such business was conducted. As used in the Interrogatory, the phrase "conducted business" is intended to be construed in the broadest sense, and includes, but is not limited to:

- a. the maintenance by you or on your behalf of any office, plant, warehouse or any other structure, in fee or by lease, in New England, New York and/or New Jersey;
- b. the employment by you or on your behalf of any person residing in the said states;
- c. the employment of any person residing outside the said states who traveled to or communicated with any person in New England, New York and/or New Jersey on your behalf,
- d. the transportation or delivery of any products, material or service by you or on your behalf to any person or business in New England, New York and/or New Jersey and
- e. the solicitation by you on your behalf, through any form of communication, of any person or business in New England, New York and/or New Jersey.

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A5. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not limited to the job sites relevant to this litigation. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. objects to the phrase "conducted business" as being overly broad, vague and ambiguous. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, Crane Co.'s headquarters have been in both New York and Connecticut. Crane Co. had facilities in Massachusetts, New Jersey and New York. Crane Co. had branches in Connecticut, Rhode Island, Maine, Massachusetts, New York and New Jersey.

Q6. Please state whether or not you have ever held a certificate of authority to do business in the State of Connecticut and the address for your registered agent for service in this state.

A6. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Crane Co. is authorized to do business in Connecticut. Its registered agent for service in Connecticut is CT Corporation System One Commercial Plaza, Hartford CT 06103.

Q7. Has this answering defendant been sued under its correct name? If not, please state the correct legal name of the defendant and provide the information requested in Interrogatory No. 1 above concerning the defendant as correctly named.

A7. Subject to and without waiving the foregoing General Objections, no, Crane Co. is not the successor to Jenkins Bros. and Weinman Pump Mfg. Co.

Q8. Has this defendant mined asbestos at any time from 1930 to the present?

A8. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

Q9. If your answer to Interrogatory 8 is "yes", please state:

- a. the inclusive dates during which asbestos was mined;

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- b. the location or locations of the mine;
- c. the identity of each person employed by you as the highest supervisory employee at the mine, at any time from 1930 to the present, and for each such person, please state his or her
 - 1. title, duties and responsibilities at the mine;
 - 2. inclusive years of employment at the mine; and
 - 3. present or last known business and residential address;
- d. each other present or former officer, employee, agent and representative of yours who has knowledge of the mining activity; and
- e. the custodian, location and identity of each document in your possession, custody or control which describes or contains information relevant to the mining activity.

A9. See objections and response to Interrogatory No. 8.

Q10. Has this defendant sold, distributed or supplied raw asbestos fiber at any time from 1930 to the present?

A10. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

Q11. If your answer to Interrogatory 10 is "yes," then for any raw asbestos fibers sold, distributed or supplied, please describe:

- a. the type and grade of asbestos sold, distributed or supplied. e.g. amosite, chrysotile, crocidolite;
- b. the source of the asbestos fiber, including the location or locations where it was mined and the identity of each person or business which furnished, sold or supplied it to you.
- c. the inclusive dates of-sale, distribution or supply;
- d. the type of container in which the raw asbestos fiber was sold, distributed or supplied, e.g. bags, drums, boxes;
- e. the date any warnings, cautions, caveats or directions first appeared on any containers of mined asbestos - fiber, the content of each warning, caution, caveat or direction, and the inclusive dates of each warning, caution, caveat or direction.
- f. whether the raw asbestos fiber was sold, distributed or supplied to any person or business located in New England, New York and/or New Jersey or to any defendant in this litigation;

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- g. the identity and title of each present or former officer, employee, agent or representative of yours, at any time from 1930 to the present, with knowledge of such sale, distribution or supply; and
- h. the identity of the custodian, location and identity of each document in your possession, custody or control which describes or contains information relevant to such sale, distribution or supply.

A11. See objections and response to Interrogatory No. 10.

Q12. If your answer to Interrogatory 11 (f) is "yes", then identify each defendant or business or person you sold or distributed raw asbestos fiber to, and with regard to each please state:

- a. the type of raw asbestos sold to that entity;
- b. the year or years in which such sales were made; and
- c. the quantity sold in each year.
- d. the identity of each person employed by you to direct, arrange or otherwise process such sale, distribution or supply.

A12. See objections and response to Interrogatory No. 11.

Q13. Has this defendant manufactured, processed, produced, sold, distributed, supplied or furnished any product containing asbestos at any time from 1930 to the present?

A13. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action, and because it is overly broad and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Crane Co.'s response to this Interrogatory shall not be construed as an admission that Crane Co. was involved in any activity with respect to asbestos-containing products that are relevant in any way to this lawsuit.

Subject to and without waiving the foregoing objections, Crane Co. was not a manufacturer of any asbestos-containing product, as that term is commonly used in asbestos litigation. Crane Co. is and has been a manufacturer of certain types of industrial equipment. Crane Co.'s principal line of industrial equipment has been industrial valves. Industrial valves manufactured by Crane Co. were made of steel, bronze, and other metals; the valves themselves were not composed of asbestos. Many of those valves bore the name "Crane," marked directly on the valve. Certain of the valves had enclosed within their metal structure asbestos-containing gaskets, packing, or discs. Crane Co. did not manufacture the asbestos-containing components that may have been encapsulated within the valves, but purchased them from other companies. Any components that may have been enclosed within the metal structure of Crane Co. valves did not emit friable or respirable asbestos fibers while enclosed within that structure. Any asbestos-containing components

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were completely encapsulated within the metal structure of the valves. Furthermore, any asbestos contained in the components themselves was chemically and physically bound within the component itself by a rubber-like compound.

Crane Co. acquired around and subsequent to 1961 the assets of industrial pump companies that became divisions of Crane Co. Subsequent to those acquisitions, Crane Co. manufactured industrial pumps that may have incorporated within their metal structure an encapsulated asbestos-containing gasket and/or asbestos-containing packing. Crane Co. did not, however, manufacture the asbestos-containing components, such as gaskets or packing, contained in the industrial pumps. It purchased those components from other companies. Any components that may have contained asbestos were enclosed within the metal structure of Crane Co. industrial pumps and did not emit friable or respirable asbestos fibers while enclosed within that structure. Furthermore, any asbestos contained in the components themselves was chemically and physically bound within the component itself by a rubber-like compound.

Crane Co. manufactured boilers in the late 1800s, a practice which it appears to have discontinued prior to 1900. Crane Co. resumed manufacturing boilers in or about 1931, suspended those operations during World War II, and discontinued that practice in the 1950s. At least some of the boilers Crane Co. manufactured through, at least, the early 1940s contained asbestos insulation. For a brief period of time after it ceased manufacturing boilers, Crane Co. sold boilers that were manufactured, at least in part, by another company. In the 1960s, Crane Co. purchased the assets of two boiler companies, which it resold a few years later. To the best of Crane Co.'s knowledge, however, the boilers, water heaters, and furnaces that Crane Co. manufactured with those acquired assets contained fiberglass, not asbestos, insulation. After it sold those assets, Crane Co. may have sold boilers, water heaters, and furnaces that it purchased from other entities. It is believed, however, that those items contained fiberglass, not asbestos, insulation.

For a period of time believed to be less than two years during the early 1960s, Crane Co., through its division, Crane-Midwest Piping, was involved with the erection of piping systems in limited geographic areas. In connection with that erection business, Crane Co. is presently aware of one project to which Crane Co. sent flat gaskets that, most likely, contained some asbestos as part of their chemical and physical composition.

Crane Co., through a division, sold industrial water treatment systems, including deaerators, water conditioners, multi-port steam relief valves, drainers, sample coolers, and condensate boosters. Those products were composed primarily of metal; they were not composed of asbestos. Depending on the application for which it was to be used, some of this equipment incorporated internal components, primarily cloth gaskets, manufactured by others, that may have contained some asbestos as part of their chemical composition. Those components were enclosed within the equipment and were not exposed during installation or normal use of the product. Prior to the mid 1980s, Crane Co. may have sold replacement gaskets for use in the industrial water treatment systems.

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To the best of Crane Co.'s knowledge, Crane Co. did not manufacture any of the internal components, but purchased them from other companies.

Crane Co. also offered for sale certain products manufactured by other companies. A small quantity of those products may have contained asbestos. Crane Co. offered for sale gaskets, packing, and discs manufactured by other companies that may have contained asbestos. Material called Cranite was manufactured exclusively for resale by Crane Co., during the relevant time period through what appears to be the early-to-mid 1970s, but perhaps extending to the early 1980s. The finished "Cranite" products had the name "Cranite" stamped directly upon them. Any asbestos contained in Cranite, however, was chemically and physically bound within a rubber-like compound that prevented the release of any friable asbestos fibers. In addition, Crane Co. offered for sale products manufactured by others at many of its branch locations. Some of these products contained asbestos. Most of those products are listed in Crane Co. catalogs, which will be made available to plaintiffs at a mutually agreeable time and place. See also Preliminary Statement, § B

- Q14. If your answer to Interrogatory 13 is "yes," then for each asbestos-containing product manufactured, produced, processed, sold, distributed, supplied or furnished by you, please state:
- a. the brand name; if any, and the generic name of the product;
 - b. the inclusive dates of manufacture, production or supply;
 - c. any other name, number or designation by which the product may be identified;
 - d. a physical description of the product, including its color, shape, size and weight per unit, its texture, the percentage of asbestos content, the type of asbestos and other mineralogical content; and
 - e. the use for which the product was manufactured or sold, e.g., as a cement, pipecovering, board, block, cloth-, rope, plaster, fireproofing material, acoustical plaster or brake lining.

A14. See objections and response to Interrogatory No. 13.

- Q15. For each product identified in your answer to Interrogatory 14 (hereinafter "your asbestos-containing products"), please identify:
- a. whether you designed the product, and if not, the identity of the business or person who did;
 - b. the year in which the product was designed or developed;
 - c. the year in which the product was first offered for sale;

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- d. the supplier or suppliers of raw asbestos used in the product, the mines where the raw asbestos was mined, and the locations from where it was shipped;
- e. if you did not manufacture, produce or process the asbestos-containing product, but sold, distributed, supplied or furnished it, the party who manufactured, produced or processed the product, and the party who supplied it to you.
- f. the location or locations where each product was manufactured or produced.
- g. the identity of each person employed by you as the highest supervisory employee at the place of manufacturing or production of your asbestos-containing products at any time from 1930 to the present; and for each such person, please state his or her:
 - 1. title, duties and responsibilities;
 - 2. inclusive dates of employment at the place of manufacture or production; and
 - 3. present or last known business and residential address.

A15. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, see objections and response to Interrogatory No. 13. Crane Co. placed on the market industrial valves that may have contained asbestos-containing materials within their metal structure as early as 1858. Asbestos was removed as a component from Crane Co.'s industrial valves in the mid-1980's, with the exception of one specific type of valve designed for petroleum industry applications, which incorporated an asbestos component until the early 1990's. In all cases, asbestos was eliminated as a component of Crane Co. products because of decreased consumer demand for products that incorporated asbestos and/or Crane Co.'s inability to obtain asbestos-containing components. Crane Co. sold Cranite sheet packing from approximately 1920 until, to the best of its belief, 1972. To the best of Crane Co.'s knowledge, the product was never manufactured without asbestos.

By way of further response, Crane Co. is not precisely aware of all of the specific entities from which it obtained asbestos-containing components for its industrial products. Nevertheless, based upon available documents, it appears that, at various times, Crane Co.'s approved suppliers may have included B.F. Goodrich Co., Goodyear Tire & Rubber Co., and Sweet Rubber Co. of Akron, Ohio, with respect to "Cranite" material, Raybestos Manhattan, Inc., Johns-Manville, Inc., Garlock, Inc., "Klingerit" and Nicolet, Inc., with respect to sheet gasket material, Crane Packing Co. (later John Crane-Houdaille, Inc.), Johns-Manville, Inc., Anchor Packing, Raybestos-Manhattan, Greene-Tweed, Garlock, Inc., Lindstrom & King, and R.M. Industrial Products with respect to valve packing, Johns-Manville, Flexitallic, Spirotallic, Lamons Gasket Co., and R-Way Gasket & Supply Co., with respect to spiral wound gaskets, Johns Manville and Keasbey Mattison with respect to cement pipe and Johns-Manville with respect to miscellaneous materials. The foregoing list

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is not intended to be an exhaustive list of Crane Co.'s suppliers. To the contrary, it merely reflects the information of which Crane Co. has become aware in the course of reviewing documentary evidence.

To the best of its present knowledge and according to its annual reports, without limitation, Crane Co. assembled and/or manufactured valves at plants located in Chicago, Illinois; Chattanooga, Tennessee; Indian Orchard, Massachusetts; Jonesboro, Arkansas; Rogers, Arkansas; Long Beach, California; and Washington, Iowa; pumps at plants located in Rogers, Arkansas; Salem, Ohio; and Warrington, Pennsylvania; deaerators at a plant located in King of Prussia, Pennsylvania; and boilers at plants located in Pennsylvania, New York, and New Jersey. Crane Co. also manufactured other products at other locations. Crane Co. did not ever manufacture any of the asbestos-containing components that may have been included in the pumps, valves, deaerators, or boilers. Accordingly, those components would not have been manufactured at any of the locations listed above.

Because Crane Co. did not manufacture asbestos-containing products, it did not have an employee dedicated to supervising the production of asbestos-containing products. See Preliminary Statement, § B.

Q16. For each of your asbestos-containing products, please describe:

- a. the container in which the product was sold, distributed or supplied and the inclusive dates when it was used;
- b. the color of the container and the inclusive dates when it was used;
- c. any logo or other design on the container and the inclusive dates when it appeared on the container;
- d. the content of any printing on the container and the inclusive dates when it appeared on the container;
- e. any instructions on the container-and the inclusive dates when they appeared on the container;
- f. any warning on the container and the inclusive dates when they appeared on the container;
- g. any other markings on the container and the inclusive dates when such markings appeared on any container.

A16. Crane Co. objects to this Interrogatory to the extent it implies (i) that Crane Co. manufactured any asbestos-containing products and that (ii) there was any possibility of injury resulting from the use of a Crane Co. product. Crane Co. objects to this Interrogatory as being overly broad and unduly burdensome because it is not limited in time or geographic scope. Subject to and without waiving the foregoing objections, Crane Co. is not presently aware of any particular "containers" that may have been associated with its products. Information responsive to this Interrogatory may be available in Crane Co.'s catalogs which Crane Co. will produce to plaintiff at a mutually agreeable time and place. By way of further answer, to the best of Crane Co.'s present knowledge, the only "warning" associated with any Crane Co. industrial product regarding asbestos was a notification which first appeared in the mid-1980s, attached to certain industrial valves that informed the user that asbestos-containing materials were contained

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within the valve. That warning read as follows: "CAUTION – Contains Asbestos Packing or Gasket". See objections and response to Interrogatory No. 13; see also Preliminary Statement, § B

Q17. Did this defendant or any of its predecessors change any aspect of the container as identified in your answer to Interrogatory 16, from the time the container was first introduced to the present? If so, then for each container, please indicate:

- a. each change, e.g., in size, shape or texture, or regarding the placement, modification or removal of any color, logo, design, name, word, number, instruction; warning or other marking on the container;
- b. the date the defendant decided to make the change;
- c. the date the container was actually changed;
- d. the reason for the change;
- e. each present or former employee, officer, representative or agent of yours at any time from 1930 to the present with knowledge of information regarding your decision to change some aspect of the container, and;
- f. the custodian, location and identity of each document in your custody, control or possession which contains information relevant to your decision to change some aspect of the container.

A17. See objections and response to Interrogatory No. 16.

Q18. Please identify each present and former employee, officer, agent or representative of yours who directed, handled, solicited, supervised, promoted or otherwise participated in the sale, supply, distribution, delivery, installation or removal in New England, New York and/or New Jersey at any time from 1930 to the present of any of your asbestos-containing products.

A18. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not have any sales personnel dedicated to asbestos-containing products. Crane Co. cannot pinpoint any employees' responsibilities to involving asbestos-containing products.

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Q19. Please describe your corporate structure concerning the manufacture, sale, advertising and supply of your asbestos-containing products from 1930 to the present. In your answer to this Interrogatory, please identify each present or former corporate department, division or other such subdivision of yours responsible for any of these activities, and with respect to each, please identify the name, title, duties, responsibilities, and current or last known business and residential address of the highest supervising employee for each such department, division or subdivision, with knowledge of any of those activities during any time from 1930 to the present.

A19. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see objections and response to Interrogatory No.13 and No. 15. Crane Co. has no specific structure related to asbestos-containing products. See annual reports for information regarding corporate organization.

Q20. For each person identified in your answer to Interrogatory 18, who participated in the sale of any of your asbestos-containing products in New England, New York and/or New Jersey at any time from 1930 to the present, please state:

- a. the person's name, title, responsibilities and inclusive years of employment;
- b. each product which they sold for you;
- c. whether they ever sold asbestos-containing products for any other defendant in this litigation, and if so, the name of said other defendant in this litigation;
- d. the geographic territory in which they promoted such sales.

A20. See objections and response to Interrogatory No. 18.

Q21. For each person identified in your answer to Interrogatory 18, who participated in your distribution or supply of any of your asbestos-containing products in New England, New York and/or New Jersey at any time from 1930 to the present, please state:

- a. the person's name, title, responsibilities and inclusive years of employment;
- b. each product which they distributed or supplied for you;
- c. the geographic territory in which they promoted the distribution or supply of your products.

A21. See objections and response to Interrogatory No. 18.

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Q22. For each person identified in your answer to Interrogatory 18, who participated in the delivery of any of your asbestos-containing products in New England, New York and/or New Jersey at any time from 1930 to the present, please state:

- a. the person's name, title, responsibilities and inclusive years of employment;
- b. each product which they delivered for you; and
- c. the geographic territory in which they made or arranged such deliveries.

A22. See objections and response to Interrogatory No. 18.

Q23. For each person identified in your answer to Interrogatory 18, who participated in the installation of any of your asbestos-containing products in New England, New York and/or New Jersey at any time from 1930 to the present, please state:

- a. the person's name, title, responsibilities and inclusive years of employment;
- b. each product which they installed for you;
- c. the geographic territory in which they promoted such installations.

A23. See objections and response to Interrogatory No. 18.

Q24. For each person identified in your answer to Interrogatory 18, who participated in the removal of any of your asbestos-containing products in New England, New York and/or New Jersey at any time from 1930 to the present, please state (as used in this Interrogatory the term removal shall mean the removal or encapsulation of any asbestos-containing product from or in any structure or thing:

- a. the person's name, title, responsibilities and inclusive years of employment;
- b. each product which was removed;
- c. the date when each product was removed;
- d. the location or locations where the product was removed;
- e. the geographic territory in which they performed or arranged such removals.

A24. See objections and response to Interrogatory No. 18.

Q25. For each person identified in your answer to Interrogatory 18, who participated in the advertising of any of your asbestos-containing products in New England, New York and/or New Jersey at any time from 1930 to the present, please state:

- a. name, title, responsibilities and inclusive years of employment;
- b. each product advertised, marketed or promoted;
- c. the method by which each product was advertised, marketed or promoted, and if by print, the name of the publication, the inclusive dates in which it appeared therein, the publisher; and the identity of asbestos-containing

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products of other defendants in this litigation which also appeared in the publication;

- d. the geographic territory in which the advertising appeared;
- e. the identity of all persons who have a copy of advertisements or promotional materials.

A25. See objections and response to Interrogatory No. 18.

Q26. Please describe your corporate structure procedures and practices concerning the subject of employee safety and product safety in the design, development, manufacture, testing and use of your asbestos containing products from 1930 to the present. In your answer to this Interrogatory, please identify each present or former corporate department, division or other such subdivision of yours responsible for any of these activities, and with respect to each, please identify the name, title, duties, responsibilities, and current or last known business and residential address of the highest supervising employee for each such department, division or subdivision, with knowledge of any of those activities during any time from 1930 to the present.

A26. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. was a manufacturer of asbestos-containing products. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not have a corporate structure related specifically to asbestos-containing products. See annual reports for information regarding corporate organization. See Preliminary Statement, Section B.

Q27. Please describe your corporate structure procedures and practices concerning the subject of the research and development of your asbestos-containing products from 1930 to the present. In your answer to this Interrogatory, please identify each present or former corporate department, division or other such subdivision of yours responsible for any of these activities, and with respect to each, please identify the name, title, duties, responsibilities, and current or last known business and residential address of the highest supervising employee for each such department, division or subdivision, with knowledge of any of those activities during anytime from 1930 to the present.

A27. See objections and response to Interrogatory No. 26.

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Q28. Did the defendant have, between 1930 and 1967, any system or follow any procedures for following technical and medical literature for new developments relating to its products containing asbestos, including new learning concerning hazards associated with asbestos. If yes, please describe such system or systems in the fullest detail you are able, including in your description any changes in the system and the years and reasons for each change.

A28. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

Q29. Were any of your asbestos-containing products stored or warehoused by you in New England, New York and/or New Jersey at any time from 1930 to the present? If so, please identify the address of each warehouse and, for each address, the identity of the product stored or warehoused there, the year or years of such storage or warehousing and the custodian, location and identity of each document in your custody, possession or control which describes or contains information relevant to such storage or warehousing.

A29. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos containing products. Subject to and without waiving the foregoing objections, Crane Co was not a manufacturer of asbestos containing products. See objections and response to Interrogatory No. 5.

Q30. Please identify the means by which your asbestos-containing products were transported to New England, New York and/or New Jersey at any from 1930 to the present.

- a. If the products were transported by rail, please identify the name or names of the railroad companies providing that service and the years during which that service was used.
- b. If these products were transported by truck, please identify the name or names of the carrier providing that service and the years during which the service was used.

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- c. If the products were transported by vessel, please identify the name or names of the shipline providing that service and the years during which the service was used.
- d. Please identify each present or former employee of yours responsible for coordinating the transporting or delivery of your asbestos-containing products to New England at any time from 1930 to the present,
- e. Please identify each employee, officer, agent or representative of yours with knowledge of the transporting of these products and the custodian, location and identity of each document which describes or contains information relevant to these activities.

A30. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. was a manufacturer of asbestos-containing products. Subject to and without waiving the foregoing objections, to the best of its present knowledge Crane Co.'s records do not enable it to readily identify the mode of transportation used to ship its good in the broad geographic area requested and to conduct a search for every shipment would create an undue burden on Crane Co. See Preliminary Statement, Section B.

Q31. Please identify the person or business who distributed any of your asbestos-containing products in New England, New York and/or New Jersey at any time from 1930 to the present. As used in this Interrogatory, a distributor is any person or business who purchased your product for resale, use or installation or who arranged or facilitated the resale, use or installation of your product for its benefit or the benefit of any third party. For each distributor, please indicate:

- a. whether the distribution relationship was exclusive or non-exclusive;
- b. the year or years in which the distribution relationship was in effect;
- c. the identity of the particular asbestos-containing products(s) of yours which the distributor was authorized to or did distribute, and in each year of distribution, the quantity of each product distributed;
- d. whether the distribution relationship was pursuant to a written or an oral agreement and in either case the terms of any such agreement;
- e. the name, title, and inclusive dates of employment of each present or former employee responsible for locating, developing, maintaining, supervising or otherwise coordinating the distribution of your asbestos or asbestos-containing products by the distributors identified herein at any time from 1930 to the present;
- f. each employee, officer, agent or representative of yours with knowledge of such distribution agreements or relationships, and the custodian, location and identity of each document in your possession, custody or control which

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describes or contains information relevant to such distribution agreement or relationship.

A31. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. employed individuals with duties specific to asbestos-containing products.

Subject to and without waving the foregoing objections, Crane Co. did not employ individuals with duties specific to asbestos-containing products. Crane Co. maintained branch houses at the following locations during some portion of the time at which it supplied at least some of the products referenced in its response to Interrogatory No. 13. Given the passage of time, however, Crane Co. cannot presently associate any branch with the sale of any specific product.

**302 John St., Bridgeport, CT
710 Windsor St. Hartford, CT;
365 Orchard St., New Haven, CT
245 W. Exchange St., Providence, RI
70 St. John St., Portland, ME;
48 W. First St., South Boston, MA;
60 Cypress St., Springfield, MA;
North Broadway, Albany, NY;
21 Washington St., Binghamton, NY;
201 Church St., Buffalo, NY;
209 Main St., Hempstead, NY;
47-30 29th St., Long Island City, NY;
101 Park Ave., New York, NY;
200 South Ave., Rochester, NY;
760 W. Genesee St., Syracuse, NY;
326 Broad St., Utica, NY;
2994 Mt. Ephraim Ave., Camden, NJ;
90 South St., Newark, NJ;
50 Escher St., Trenton, NJ;**

Beginning in or around the late 1950s and ending in 1987, Crane Co. began closing or selling its supply branch locations in the United States. The Trenton branch was sold in 1960. The Portland branch was sold in 1971. The Springfield branch was sold in 1972. The Buffalo branch was sold in 1979. Crane Co. believes that the remainder of the above mentioned branches were closed or sold prior to the early 1970s. See Preliminary Statement, § B.

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Q32. Please state whether you sold, distributed, supplied, delivered or otherwise furnished any of the following entities in New England, New York and/or New Jersey: United States Government, Central Services Agency, United States Navy, any naval shipyard, and other shipyards at any time from 1930 to the present. For each entity identified by you in your answer to this Interrogatory, please state:

- a. the brand name or trade name of the asbestos-containing product sold, supplied, distributed, delivered or furnished by you to such person or business;
- b. the year or years in which the product was sold, distributed, delivered or furnished and for each year, the quantity sold, distributed, delivered or furnished;
- c. the means of transportation by which the product was delivered to the person or business;
- d. each location or locations from which the product was transported;
- e. the location to which the product was delivered;
- f. the location or locations where the product was installed, applied or used in New England, New York and/or New Jersey;
- g. the identity of each contractor, sub-contractor, installer or other business which ultimately installed, applied or used the product in New England, New York and/or New Jersey;
- h. the identity of each present or former employee, officer, agent or representative of yours responsible for supervising, overseeing, promoting, developing, maintaining, or otherwise coordinating the sale, distribution, delivery or furnishing of these products to such entities;
- i. the name and title of each present or former employee of yours from 1930 to the present who holds or held the highest supervisory position concerning any of the activities described in subpart (h), above; and
- j. the custodian, identity and location of each document which refers to or contains information relevant to such sale, distribution, delivery or furnishing.

A32. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not in any way limited to the job sites where the plaintiff worked. Crane Co. further objects to this Interrogatory because it seeks information not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos containing products. Crane Co. has already informed plaintiff that it is not aware of the sale of any Crane Co. product to the plaintiff's job sites. See Crane Co.'s Responses to Plaintiffs' Requests for Admission to Defendant Crane Company and Crane Co.'s Responses to Plaintiffs' Supplemental Interrogatories and Requests for Production of Defendant, Crane Company.

Q33. Did this defendant ever sell, distribute or otherwise furnish any asbestos-containing products to any defendant in this litigation for delivery, use, installation or resale or redistribution in New England, New York and/or New Jersey, at any time from 1930

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to the present? If so, please identify each defendant to which you sold, distributed or furnished your product, and for each defendant identified, please state:

- a. the brand name of each product sold, distributed or furnished to it;
- b. whether the product was intended to be used, installed, distributed or resold by that defendant in the condition when shipped by you;
- c. whether the product, if used, installed, distributed, or resold by that defendant was so used, installed, distributed or resold under the name indicated in your answer to subpart (a) of this Interrogatory or if not, the name under which it was intended to be used, installed, distributed or resold;
- d. whether any intended use of the product by that defendant was pursuant to any relabeling agreement or other agreement, and if so, please identify and describe the agreement;
- e. for each product described in subparts (a-d), state the year or years in which the product was sold, distributed, delivered or otherwise furnished by you to the defendant, and for each such year, the quantity of each product sold, delivered, distributed or furnished to the defendant;
- f. the location where the product was delivered, applied, used or installed;
- g. the identity of any contractor, sub-contractor, installer or other business which ultimately applied, used or installed the product in New England, New York and/or New Jersey;
- h. the identity of each present or former employee, officer, agent or representative of yours with the highest supervisory responsibility for supervising, overseeing, developing, maintaining or otherwise handling the sale, distribution, delivery or furnishing of the product to that defendant; and
- i. the identity of each employee, officer, agent or representative of yours with knowledge of such sale; distribution, delivery or furnishing and the custodian, location, and identity of each document in your custody, possession or control which refers to or contains information relevant to such sale, distribution, delivery or furnishing.

A33. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not in any way limited to the job sites where the plaintiff worked. Crane Co. further objects to this Interrogatory because it seeks information not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos containing products. Crane Co. has already informed plaintiff that it is not aware of the sale of any Crane Co. product to the plaintiff's job sites. See Crane Co.'s Responses to Plaintiffs' Requests for Admission to Defendant Crane Company and Crane Co.'s Responses to Plaintiffs' Supplemental Interrogatories and Requests for Production of Defendant, Crane Company.

Q34. Please describe the method by which you have maintained records concerning the manufacture, sale, advertising, distribution, delivery and installation of each of your

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asbestos-containing products from 1930 to the present. In your description, please identify:

- a. each present or former corporate department, division or such subdivision of yours responsible for maintaining those records;
- b. how the records are kept, e.g. in boxes, files, on microfilm, microfiche or computer tape or disk;
- c. the inclusive dates of manufacture, sale, advertising, distribution, delivery and installation that the recordkeeping system covers;
- d. the location or locations where they are kept; and
- e. the identity of each person employed by you at any time from 1930 to the present, in the highest supervisory capacity, who is or was directly responsible for the collection and maintenance of these records, and with respect to each person, his or her
 1. title, duties and responsibilities;
 2. inclusive dates of employment; and
 3. present or last known business and residential address.

A34. Crane Co. objects to this Interrogatory on the grounds that the scope of the inquiry is so broad that this inquiry is nothing more than a prohibited fishing expedition. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, in that it is not limited in any way to plaintiff's exposure. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. has no organized collection of sales records related to products that may have contained asbestos or incorporated asbestos-containing components. Records relevant to the issues raised in this Interrogatory may be located in various document repositories or operating facilities. Nevertheless, as presently worded, this Interrogatory is overbroad, and not capable of a meaningful response. See Preliminary Statement Section B.

Q35. Does your record keeping system identify:

- a. persons or businesses who purchased, distributed, sold, installed or used any of your asbestos-containing products in New England, New York and/or New Jersey? If so, for each person or business, does it identify:
 - 1) the particular product purchased, distributed, sold, installed or used,
 - 2) the date or dates of such activities; and
 - 3) the amount of the product used by that person or business;
- b. any location where the product was
 - 1) manufactured; 2) delivered; 3) stored; or 4) installed;
- c. the source or supplier of the raw asbestos fiber used in the manufacture or production of the product; and

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- d. the manufacturer or producer of the product, if not manufactured or produced by you; and
- e. the process by which each product was 1)developed, 2)designed, 3)tested, 4)marketed.

A35. See objections and response to Interrogatory No. 34.

Q36. If your record keeping system consists of microfilm, microfiche, computer tape or disk or other system whereby data is taken from other records, have you retained the documents or other materials from which the information entered into these record keeping systems was obtained? If so, please identify the custodian and location of those records. If not, please indicate the date when and the location where the records were destroyed, the custodian and location of the records prior to their destruction and each employee, representative, official or agent of yours who ordered, authorized or supervised the destruction of these records.

A36. See objections and response to Interrogatory No. 34.

Q37. Please identify any location in New England, New York and/or New Jersey where any of your asbestos products were used, applied or installed from 1930 to the present. For each location identified, please state:

- a. the name of the product used, applied or installed;
- b. each date on which the product was used, applied or installed at that location;
- c. the quantity of the product used, applied or installed for each date at that location;
- d. the person, business or employer who ultimately used, applied or installed the product at that location;
- e. whether you sold or distributed the product directly to the person or business ultimately installing, applying or using the product, and if not, the identity of each distributor, retailer or wholesaler of your product involved in that particular sale or distribution;
- f. the identity of each employee, official, representative or agent of yours who participated in the sale or distribution of the product for that location; and
- g. the custodian, location and identity of each document in your custody, possession or control which refers to or contains information relevant to the sale or distribution of your product and its ultimate installation, application or use at that location.

A37. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not in any way limited to the job sites where the plaintiff worked. Crane Co. further objects to this Interrogatory because it seeks information not relevant to this action and it is not reasonably calculated to lead to

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the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos containing products. Crane Co. has already informed plaintiff that it is not aware of the sale of any Crane Co. product to the plaintiff's job sites. See Crane Co.'s Responses to Plaintiffs' Requests for Admission to Defendant Crane Company and Crane Co.'s Responses to Plaintiffs' Supplemental Interrogatories and Requests for Production of Defendant, Crane Company.

Q38. Please identify each competitor of yours for the sale or distribution of asbestos-containing products in New England; New York and/or New Jersey at any time from 1930 to the present. As used in these Interrogatories, the term "competitor" is intended to include any person or business which manufactured, produced, processed, sold, distributed or supplied any asbestos-containing products intended for the same or similar use as any asbestos-containing product of this defendant.

A38. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to the term "competitor" as being vague and ambiguous. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Plaintiffs are in a better position to answer this Interrogatory than Crane Co.

Q39. For each competitor identified in Interrogatory 38, please identify:

- a. each asbestos-containing product which it sold or distributed in New England, New York and/or New Jersey, and with respect to each, your asbestos-containing product(s) intended for the same or similar use; and
- b. each person or business in New England, New York and/or New Jersey which sold, supplied or distributed its asbestos-containing products.

A39. See objections and response to Interrogatory No. 38.

Q40. Are you aware that any other miners, millers, manufacturers; distributors or suppliers of asbestos or asbestos-containing products have placed a warning concerning pulmonary hazards on any of its products? If your answer is in the affirmative, please identify each miner, miller, manufacturer, distributor or supplier and the date by month and year, that it placed a warning on each of its products.

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A40. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory because it is unduly burdensome because it is not limited in time or geographic scope. Plaintiffs are in a better position to answer this Interrogatory than Crane Co.

Q41. Have you ever conducted any dust studies in any of your asbestos product manufacturing facilities? If so, please state:

- a. the date of each such study;
- b. the person conducting the study;
- c. the result or conclusion;
- d. who presently has possession of the report or study;
- e. the purpose of each study.

A41. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. was not a manufacturer of asbestos-containing products as it understands that term and as that term is commonly used in asbestos litigations. By way of further responses, in the 1980s, Crane Co. performed dust monitoring at two of its valve plants. The results of that monitoring revealed the presence of fibers at no greater than background levels.

Q42. Has this defendant or any of its predecessors ever changed the percentage of asbestos in any of its asbestos-containing products manufactured or produced since 1930? If so, then for each product in which the asbestos content has been changed, please identify:

- a. the name of the product;
- b. the original asbestos content beginning in 1930 or in any year thereafter, when it was first produced if the product was not produced 1930;
- c. each change in the asbestos content;
- d. the year in which each change occurred;
- e. the reason for each change in the asbestos content; and
- f. the identity of each employee or officer of yours who participated in any decision or was present at any meeting at which the decision to change the asbestos content was discussed or made.

A42. Crane Co. objects to this Interrogatory, because (i) it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence; (ii) it is not in any way

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limited to the alleged exposure of the plaintiffs in these actions, and (iii) it is unduly burdensome, because the multitude of different types of industrial equipment Crane Co. produced makes it impossible to answer. Crane Co. further objects to this Interrogatory to the extent it implies that Crane Co. was a manufacturer of asbestos containing products.

Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. Crane Co. did not manufacture the asbestos-containing products that it purchased. To the best of its present knowledge, it did not ever request a change in the percentage of asbestos in any product it purchased.

Q43. Did this defendant or any of its predecessors ever discontinue using asbestos in any of the products identified in your answer to Interrogatory 14, or introduce an asbestos-free product as a replacement, substitution or alternative for any of your asbestos-containing products?

- a. If you discontinued using asbestos in any of the products identified in your answer to Interrogatory 14, please state:
 - 1. the name of the product;
 - 2. the date on which asbestos was removed from the product;
 - 3. the reason for discontinuation or removal of asbestos from the product; and
 - 4. the identity of each employee or officer of yours who participated in the decision or was present at any meeting at which the decision to remove or discontinue using asbestos in the product was discussed or made.
- b. If you introduced an asbestos-free product as a replacement, substitution or alternative for any of your asbestos-containing products, please state:
 - 1. the name of the discontinued product;
 - 2. the name of the replacement product;
 - 3. the year in which the replacement product was introduced;
 - 4. the reason for the introduction of the new asbestos-free product;
 - 5. the identity of each employee or officer who participated in the decision or were present at any meeting at which the decision to introduce the asbestos-free product was discussed or made.

A43. Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Crane Co. further objects to this Interrogatory to the extent it implies that there was a product that was a "replacement," "substitution" or "alternative" for asbestos-containing components that may have been associated with any Crane Co. product. Subject to and without waiving the foregoing objections, in the late 1970s and early 1980s, as a result of changes in customer preferences, Crane Co. began to explore the prospect of replacing the asbestos-containing components in its industrial products. At that time, Crane Co. encountered difficulty locating suitable substitute components. Nevertheless, Crane Co., modified its engineering specifications in 1985 to phase out asbestos-containing components from all valves manufactured in the United

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States other than one specific valve designed for petroleum industry applications, which required the use of asbestos-containing packing material.

Q44. Did you ever conduct or has anyone on your behalf conducted any tests concerning the human health consequences of the use of your asbestos-containing product. If so, please state:

- a. what tests were done;
- b. who was responsible for conducting the tests;
- c. what the results of the tests were, and
- d. identify any documents concerning the tests.

A44. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. did not believe that any product it sold was hazardous when used as intended, therefore, Crane Co. did not conduct any such tests.

Q45. Did you ever conduct any tests concerning the human health consequences related to the manufacture of your asbestos-containing product. If so, please state:

- a. what tests were done;
- b. who was responsible for conducting the tests;
- c. what the results of the tests were; and
- d. identify any documents concerning the tests.

A45. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. did not manufacture asbestos-containing products as it understands that term and as that term is commonly used in asbestos litigation. Thus it did not conduct any tests at locations where asbestos-containing products were manufactured.

Q46. Do any written memoranda, specifications, recommendations or other written material of any kind or character exist related to the testing referred to in Interrogatory Nos. 44 and 45? If so please state:

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- a. identity of each such written material or document;
- b. the present custodian of each such document and where the document located.

A46. See objections and responses to Interrogatory Nos. 44 and 45.

Q47. Have you ever conducted any tests concerning the human health consequences of the use and manufacture of your product following the date that the asbestos content was removed from said products or materials? If so, please state:

- a. what tests were done;
- b. who was responsible for conducting the tests;
- c. what the results of the tests were; and
- d. identity any documents concerning the tests.

A47. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, Crane Co. did not manufacture asbestos-containing products as it understands that term and as that term is commonly used in asbestos litigation and it did not conduct any tests relating to the human health consequences of asbestos-containing products.

Q48. When, if ever, did you specifically inform the purchaser or user of your products or materials that contained asbestos that the use of that product or material exposure to asbestos dust could cause cancer, asbestosis or other serious disease? Please identify the document containing this information by date and location.

A48. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, Crane Co. warned purchasers and users of asbestos in valves starting in 1985. That warning read "CAUTION – Contains Asbestos Packing or Gasket." It did not contain any further information. By way of further answer, Crane Co. did not believe then, nor does it believe today, that exposure to the components of those valves could have caused any of the medical conditions identified in this Interrogatory.

Q49. Identify any and all labeling or relabeling agreement for asbestos-containing products in existence since 1930 between you and any other person including defendants as defined in the introductory Instructions and Definitions.

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A49. Crane Co. objects to this Interrogatory because the term "relabeling" is vague and ambiguous. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s knowledge, it never engaged in the "relabeling" of asbestos-containing products, as it understands those terms. See also objections and response to Interrogatory No. 13; Preliminary Statement, Section B.

Q50. Has this defendant ever acquired the assets, stock or property of another person, corporation, company or business entity, which manufactured, sold, processed or distributed products or materials containing asbestos?

A50. Crane Co. objects to this Interrogatory because it is overly broad, unduly burdensome and it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, yes.

Q51. If the answer to the above interrogatory is "yes," please state the following concerning such other persons or entities:

- a. the full and correct name;
- b. the principal place of business;
- c. the state of incorporation;
- d. the date of its acquisition by you; and
- e. the products or materials that the other person or entity manufactured, distributed, sold or used.
- f. the date of the agreement;
- h. whether the agreement contained any provisions regarding indemnification to you by such other person or entity for any claims concerning the condition or merchantability of the product; and
- i. the custodian and location of the original agreement and each note, draft, memorandum or correspondence relating to the agreement.

A51. Crane Co. objects to this Interrogatory because it is overly broad, unduly burdensome and it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see objections and response to Interrogatory No. 13. By way of further responses, information responsive to this Interrogatory may be available in Crane Co.'s annual reports, copies of which will be provided to plaintiffs at a mutually agreeable time and place.

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Q52. Is the defendant the result of, or the surviving corporation of any combination, consolidation, merger or reorganization involving another person, corporation, company, partnership or business entity which mined, manufactured, produced, sold, distributed or supplied asbestos or any asbestos-containing product or material from 1930 to the present?

A52. Crane Co. objects to this Interrogatory because it is overly broad, unduly burdensome and it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, see objections and response to Interrogatory No.13. By way of further responses, information responsive to this Interrogatory may be available in Crane Co.'s annual reports, copies of which will be provided to plaintiffs at a mutually agreeable time and place.

Q53. If your answer to Interrogatory 52 is "yes," then for each such person or business, please state:

- a. its full and correct name;
- b. its date of incorporation and principal place of business;
- c. the date of its incorporation;
- d. the date of the combination, consolidation, merger or reorganization;
- e. a description of any contract or agreement describing the combination, consolidation, merger or reorganization;
- f. the name, title and present or last known business and residential address of the signatories of any agreement identified in subpart(e);
- g. the name, title and present or last known business and residential address of the custodian of each record which describes or relates to the said combination, consolidation, merger or reorganization.

A53. See objections and response to Interrogatory No. 52.

Q54. For each product manufactured, sold or distributed by you state:

- a. whether or not you have actual containers or photographs of containers in which said products were sold or distributed;
- b. the name of the custodian or keeper of said containers or photographs including his/her address and telephone number.

A54. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome and it is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, information that may be responsive to this Interrogatory is contained in its catalogs, copies of

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which will be provided to plaintiffs at a mutually agreeable time and place. The catalogs are maintained by Crane Co.'s legal department or its litigation counsel.

Q55. State whether or not any warnings, cautions, caveats or directions accompanied the raw asbestos fiber referred to in Interrogatory 15(e) and identify the nature and extent of said warnings, cautions, caveats or directions accompanying said fiber.

A55. There is no raw asbestos fiber referenced in response to Interrogatory No. 15(e).

Q56. When was the first time that you received notice that any person was claiming an injury as the result of using asbestos-containing products manufactured and/or sold by your company, including, but not limited to, worker's compensation claims.

A56. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence because plaintiff in this action has not alleged that he worked at or was exposed to asbestos-containing products at a Crane Co. facility. Subject to and without waiving the foregoing objections, the first lawsuit related to asbestos was brought against Crane Co. in 1983.

Q57. For each such asbestos related injury that you received notice of a claim prior to December 31, 1973, please list:

- a. the name and address of each claimant;
- b. the date of the notice of each claim;
- c. a description of the claim (i.e., worker's compensation, disability, or a third-party liability action);
- d. the type of injury allegedly sustained;
- e. the name and address of each attorney who represents individuals making such claims;
- f. the jurisdiction or district and the court number of each claim;
- g. the resolution of each claim that has been disposed of; and
- h. the custodian of the records that relate to the claim (in lieu of answering the above question, you may attach copies of any and all claims).

A57. To the best of Crane Co.'s present knowledge, none. See objections and response to Interrogatory No 56.

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Q58. Do you contend that products containing asbestos can be manufactured or treated so as to eliminate all potential health hazards to workers installing the same? If so, please explain in detail what your contentions are and the basis for each contention.

A58. Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured any asbestos-containing products. Crane Co. further objects because this Interrogatory seeks information that is not relevant to this action, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to Crane Co.'s products. Crane Co. does not consider itself competent to offer opinions as to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Nevertheless, Crane Co. did not believe that any product it sold was hazardous when used as intended.

Subject to and without waiving the foregoing objections, any asbestos dust or fibers that may have been emitted from the asbestos-containing components encapsulated within Crane Co.'s valves was at a de minimis level and significantly below OSHA regulatory levels. Moreover, at such low levels, there has never been an OSHA requirement that warnings or precaution labels regarding asbestos be placed on these components or their packaging. Accordingly, Crane Co. contends that the asbestos-containing components contained within its industrial equipment did not pose health hazards to workers who came into contact with them.

Q59. Did you receive any reports or communications from your worker's compensation insurance carrier, or products liability insurance carrier, with regard to the hazards incident to the use of asbestos-containing products? If so, please state who has possession of such reports, the location of such reports and the substance of the contents of such reports, listing for each such report the respective insurance company, its address, the agents signing such correspondence and the date of such notice or report.

A59. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

Q60. Have any of the co-defendants named in this litigation ever furnished you with any information as to the state of the medical knowledge regarding the connection between asbestos dust exposure and the contracting of pulmonary diseases including asbestosis and cancer?

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A60. Subject to and without waiving the foregoing objections, outside of documents that may have been received in the context of asbestos litigation, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

Q61. If the answer to the preceding Interrogatory is in the affirmative, please identify:

- a. what information you were furnished;
- b. who furnished that information; and
- c. when the information was furnished.

A61. See objections and response to Interrogatory No. 60.

Q62. Have you at any time since 1930 exchanged results of research tests, medical studies or experiments regarding the state of the medical knowledge regarding the connection between asbestos exposure and the contracting of pulmonary diseases including lung cancer and asbestosis with any other person, including any co-defendants in this action?

A62. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, outside documents that may have been exchanged in the context of asbestos litigation, to the best of Crane Co.'s present knowledge, no. See Preliminary Objections, Section B.

Q63. If the answer to the preceding interrogatory is in the affirmative, please state:

- a. when this interchange took place;
- b. who participated in these interchanges; and
- c. summarize the content of these interchanges or studies.

A63. See objections and response to Interrogatory No. 62.

Q64. Please state if you or anyone on your behalf ever conducted, sponsored or contributed financially to any studies or research to determine if the inhalation of asbestos fibers may be harmful.

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A64. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no.

Q65. If the answer to the above question is in the affirmative, please state:

- a. by whom the research was conducted, giving complete names and addresses;
- b. the dates that each such research project or test was conducted;
- c. the complete results of each test or study;
- d. identify all documents that refer, reflect or relate to the test or study; and
- e. supply copies of the reports of the research department pertaining to the use by the corporation of asbestos in the manufacture of its products.

A65. See objections and response to Interrogatory No. 64.

Q66. Please state the names and addresses of your chief medical officers from 1930 until the present time, listing the periods of time each such medical officer was employed by defendant in that capacity. If you did not have a medical officer, please indicate what person or persons performed that function.

A66. Crane Co. objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome, and seeks information that is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not have a medical officer devoted to asbestos issues. See Preliminary Statement, §B.

Q67. Please state the names and addresses of all physicians who were employed, retained or otherwise engaged by you at any of your manufacturing facilities from the years 1930 until the present.

A67. Crane Co. objects to this Interrogatory on the grounds that it assumes facts not in evidence, is overbroad, unduly burdensome and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence because plaintiff in this action has not alleged that he worked at or was exposed to asbestos-containing products at a Crane Co. facility.

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Q68. Please state the names and addresses of all persons employed by you from 1930 until the present time who functioned as industrial hygienist. As used in this interrogatory, an Industrial Hygienist is one who performs engineering or health studies to identify and evaluate potential occupational health hazards and suggest methods of dealing with the same.

A68. Crane Co. objects to this Interrogatory on the grounds that it assumes facts not in evidence, is overbroad, unduly burdensome and seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it does not know of any industrial hygienist that Crane Co. employed whose duties were specific to asbestos issues, outside of its litigation efforts. See Preliminary Statement §, B.

Q69. For each Industrial Hygienist listed above, please state:

- a. the facility or office to which that individual was assigned; and b. the complete and precise duties and responsibilities.

A69. See objections and response to Interrogatory No. 68.

Q70. Please identify each statement, conclusion, warning, recommendation or suggestion made to you pertaining to the risks and hazards associated with the manufacturing or use of products containing asbestos.

A70. Crane Co. objects to this Interrogatory because it is vague, ambiguous, overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. As it is presently worked this Interrogatory is over broad and not capable of a meaningful response.

Q71. With respect to each communication identified in your answer to Interrogatory 70, please state:

- a. where the communication was made;
- b. who made the communication;
- c. to whom the communication was made;
- d. the substance of the communication; and
- e. what actions did you take as the result of it.

A71. See objections and response to Interrogatory No. 70.

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Q72. Do you agree that there is a causal connection between exposure to asbestos dust and:

- a. asbestosis;
- b. lung cancer;
- c. mesothelioma;
- d. other cancers of the gastrointestinal tract;
- e. cancer of the larynx and kidney.

A72. Crane Co. objects to this Interrogatory on the grounds that it assumes facts not in evidence. Crane Co. does not consider itself competent to offer opinions as to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis. Subject to and without waiving the foregoing objections, Crane Co. states that in an organization of its size and duration, it is impossible to determine when a responsible employee first learned that forms of asbestos were, under certain circumstances, possibly associated with harmful effects in humans. Crane Co. believes that its knowledge may have come from employees reading publications, but cannot identify which publications may have been the original source or state under oath precisely when those specific publications were actually received or read or by whom.

To Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published Permissible Exposure Limits for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the PEL for a working lifetime without the production of disease.

It is also impossible to state when a responsible employee first learned when specific allegations were made of the connection between asbestos exposure and specific diseases. Knowledge in this area, as in all scientific areas, develops over time and allegations in scientific literature may not be generally accepted when first reported, and may be confirmed or refuted by subsequent studies.

With respect to subpart (a), (b), and (c), Crane Co. believes that employees were aware of allegations of the relationship between some forms of asbestos and disease at least by the 1970's. With respect to subparts (d) and (e), Crane Co. is not aware of any established causal link between the diseases referred to and asbestos exposure.

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Q73. If your answer to the previous interrogatory is "yes" as to any or all subparts, please identify the following as to each disease process listed above:

- a. when and how you first learned of such connection;
- b. if the knowledge was obtained by the attendance at any conference, lecture, convention, symposium or meeting, identify such event and provide the name of the person attending or the documents obtained from that meeting;
- c. if knowledge was obtained from a medical or scientific study or any other published works, identify the same;
- d. if the knowledge was otherwise obtained, identify the manner of receipt of the document or communication.

A73. See objections and response to Interrogatory No. 72.

Q74. With regard to any knowledge obtained subsequent to that identified in the previous interrogatory, please identify:

- a. all documents or other communications, oral or written, concerning the causal connection between exposure to asbestos dust or asbestos products and the disease processes identified in Interrogatory No. 72 above; and
- b. identify the person communicating the information.

A74. See objections and response to Interrogatory No. 72.

Q75. If you do not agree that there is a causal-connection between exposure to asbestos dust and any of the diseases listed in Interrogatory No. 72, please state in full detail all the facts on which the defendant bases a contention that there is not such a causal connection.

A75. See objections and response to Interrogatory No. 72.

Q76. When and by what manner did management personnel of your company first become aware of the hazards of exposure to asbestos or asbestos-containing products?

A76. See objections and response to Interrogatory No. 72.

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Q77. Identify any medical examination programs offered or sponsored by you or your insurance carrier for employees handling or otherwise exposed to asbestos and asbestos containing products. With respect to each such program, please state:

- a. the manner of communicating with employees about such program;
- b. whether the examination was mandatory or optional;
- c. what percentage of workers permitted to undergo such examination actually participated;
- d. what percentage of workers were found to have either asbestosis, mesothelioma, or bronchogenic carcinoma;
- e. with respect to (d), what percentage of such workers were paid disability, worker's compensation benefits or for whose benefit medical expenses were paid to undergo treatment for such condition.

A77. Crane Co. objects to this Interrogatory because the plaintiff in this action has not alleged that he worked at or was exposed to asbestos-containing products at a Crane Co. facility. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not have any medical examination programs relating to asbestos. See Preliminary Statement, Section B.

Q78. Identify all trade organizations, associations or other entities, including but not limited to ATI, IHF, NAIMA, AIA, NICA, QAMA, PICA, QAPA, to which you have belonged or in which you have participated since 1925 and the years of your participation.

A78. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co. also objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the extent relevant, to the best of its knowledge, Crane Co. was a member of the National Safety Council (approximately 1975-1996) and the Valve Manufacturers Association (approximately 1938 to present). Crane Co. was a member of the American Petroleum Institute and Cast Iron Boiler Association, at some point. See Preliminary Statement, Section B.

Q79. Identify all persons attending on your behalf any meetings held by any trade organization listed in the Interrogatory stated above.

A79. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome and it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, William McLean may have attended meetings of the American

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Petroleum Institute at some point. Crane Co. also has documents indicating that one of its employees attended a meeting of the Valve Manufacturers Association in 1987. See Preliminary Statement, Section B.

Q80. Identify by name or nature all notes, reports, studies or other writings submitted by you or received by you at meetings identified in the interrogatory stated above.

A80. Crane Co. objects to this Interrogatory because it is overly broad because it is not limited to asbestos. Crane Co. also objects to this Interrogatory because it is unduly burdensome and it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it is not aware of any information responsive to this Interrogatory relating to asbestos. See Preliminary Statement, Section B.

Q81. Identify any documents you received from or submitted to those trade organizations, associations or other entities identified in Interrogatory 78 relating to the relationship between asbestos exposure and disease.

A81. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it received a copy of a draft article for comment from the Valve Manufacturers Association in 1987. To the best of Crane Co.'s present knowledge, that article was not published. See Preliminary Statement, Section B.

Q82. Did you direct, sponsor, finance or receive the results of any studies or tests performed by the Saranac Laboratory or the Trudeau Foundation relating to asbestos exposure and its effect on human life? If so, please identify:

- a. all documents summarizing findings or results of those studies or tests which you have in your possession or control;
- b. all communications, oral or written, between answering defendant and Saranac personnel, including but not limited to Gerrit W. H. Schepers, M.D.;
- c. all documents relating to Saranac studies received or submitted by you, either directly, through associated or predecessor companies, through other companies, or through any trade associations, organizations or entities;
- d. all recommendations or findings of such studies in relating to:

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1. adequacy or inadequacy of the threshold limited values;
 2. the substitution of materials other than asbestos to be used in the insulation process; and
- e. where the documents and/or communications identified in this interrogatory are presently maintained.

A82. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, no.

Q83. Identify all persons who have testified on your behalf and all documents presented to or-utilized in preparation of testimony before the Occupational Safety and Health, any U.S. Congressional committee or sub-committee or governmental hearing or investigative proceeding on the subjects of biological effects on human life from exposure to asbestos and the setting, modification, feasibility and acceptance of allegedly safe or proper levels of such exposure to asbestos and asbestos-products.

A83. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, none. See Preliminary Statement, Section B.

Q84. For all testimony set forth above, please identify:

- a. the dates and descriptions of the proceedings;
- b. the relationship between the person who testified or responded and you,
- c. all studies, tests results or other scientific or medical documents relied upon by said person as a basis for any recommendation made or testimony given;
- d. whether at any time prior to or following such testimony you possessed knowledge of documents suggesting that existing or proposed threshold limit values were not safe or proper or that lower threshold limit values were necessary in order to prevent disease, as to this response, please identify the origin of the knowledge and all documents relating thereto; and
- e. whether at any time prior to or following such testimony you were aware that the proper method for determination of safe levels of asbestos dust was to test concentrations of fibers in the air rather than the total number of particles. If your answer is in the affirmative, identify the origin of said knowledge and all documents relating thereto.

A84. See objections and response to interrogatory No. 83.

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Q85. What do you understand "threshold value limit" to mean and what is being measured when you take the measurement of threshold limit value as you define it?

A85. Crane Co. objects to this Interrogatory because it seeks information requiring the expertise of an industrial hygienist. Crane Co. further objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. "Threshold value limit" is a defined term used by Industrial hygienists, Crane Co. defers to their expertise for its meaning.

Q86. What do you understand "dose response relationship" to mean?

A86. Crane Co. objects to this Interrogatory because it seeks information requiring the expertise of an industrial hygienist. Crane Co. further objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. "dose response relationship" is a defined term used by industrial hygienists, Crane Co. defers to their expertise for its meaning

Q87. Did you ever state in advertising that any of your asbestos containing products were suitable for use on ships or navy vessels: If yes, please state:

- a. name of product;
- b. intended use of product;
- c. years you advertised product;
- d. where you advertised product.

A87. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome. Crane Co further objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, information responsive to this Interrogatory may be obtained from Crane Co.'s catalogs, copies of which will be provided to plaintiffs at a mutually agreeable time and place. See Preliminary Statement, Section B.

Q88. Prior to the first time you used asbestos in any of your products, did you conduct any tests on:

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- a. the effects of asbestos on the health of human beings; and/or
- b. the level of asbestos dust in the air when your product was used as intended; If yes, fully describe each such test.

A88. Subject to the foregoing objections. Crane Co. did not use asbestos in its products. Crane Co. did not test products that were manufactured by others.

Q89. Prior to the first time you used asbestos in any of your products did you conduct any research in the medical or scientific literature on the effects of asbestos on the health of human beings. If so, fully describe:

- a. the research done;
- b. when it was done;
- c. who conducted the research; and
- d. the results of the research.

A89. Subject to the foregoing objections. Crane Co. did not use asbestos in its products. Crane Co. did not conduct research with respect to products that were manufactured by others.

Q90. If the defendant has policies of insurance that might cover the claims that have been made by the plaintiff herein, please list:

- a. the name of each insurance carrier;
- b. the amount of such coverage; and
- c. the dates of each such policy.

A90. Crane Co. objects to this Interrogatory to the extent it implies that Crane Co. is liable on any of the claims made by Plaintiffs herein. Subject to and without waiving the foregoing objections, the following chart identifies the confirmed primary insurance coverage available to Crane Co. Additional primary coverage may be available for prior years, but is subject to dispute by certain carriers:

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Carriers	Policy Number	Term	Limits
Globe Indemnity	GLC 011930	1/1/60-1/1/61	1 M OCC/2M AGG
Globe Indemnity	GLC 011931	1/1/61-1/1/62	1M OCC/2M AGG
CCC	CL 4293679R	7/1/61-7/1/64	1M OCC/2M AGG PER YEAR
Liberty Mutual	LG1621004017028	2/1/68-2/1/69	1M OCC/2M AGG
Liberty Mutual	LG1621004017029	2/1/69-2/1/70	1M OCC/2M AGG
Liberty Mutual	LG1621004017020	2/1/70-2/28/71	1M OCC/2M AGG
Hartford	10 CA 46800	2/28/71-7/1/72	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/72-7/1/73	1M OCC/1M AGG
Hartford	10 CA 46801	7/1/73-7/1/74	1M OCC/1M AGG
Aetna	01AL260803SCA	7/1/76-7/1/77	1M OCC/1M AGG
Aetna	01AL260851SCA	7/1/77-7/1/78	1M OCC/2M AGG
Aetna	01GL8SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	01AL265932SCA	7/1/78-7/1/79	1M OCC/2M AGG
Aetna	01GL1475SCA	7/1/79-7/1/80	1M OCC/2M AGG
Aetna	01AL265996SCA	7/1/79-7/1/80	1M OCC/2M AGG
Continental	SRL3636025	7/1/80-7/1/81	1M OCC/2M AGG
Continental	SRL3636199	7/1/81-7/1/82	1M OCC/2M AGG
INA	CFG209262	7/1/82-7/1/83	1M OCC/2M AGG
INA	CFG209868	7/1/83-7/1/84	1M OCC/2M AGG
INA	CFG3141403	7/1/84-7/1/85	1M OCC/2M AGG
INA	CFG G07749673	7/1/85-7/1/86	1M OCC/3M AGG

Q91. Please identify each and every jobsite in the states of New York, New Jersey, Rhode Island, Massachusetts and Connecticut on which you were a contractor, or provided a boiler, furnace, turbine, or generator, from the period of 1930 until 1985 inclusive. For each jobsite, state:

- a. the inclusive dates you were on the job;
- b. the insulation contractors and or subcontractors who were on the job;
- c. the type of job (e.g., powerhouse, industrial plant, etc.);
- d. the steamfitting contractors and or subcontractors who were on the job;
- e. the spray contractors and or subcontractors who were on the job;
- f. any and all safety precautions against the hazards of inhaling asbestos fibers you undertook on the job, for the protection of persons on the jobsite, including but not limited to your own employees and those of other contractors or subcontractors;
- g. whether any provision of the contract or any subcontract arising thereof called for or specified the use of asbestos containing products;
- h. whether you have knowledge of any asbestos containing products used on the job.

A91. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome in that it is not limited to job sites where plaintiff worked. Crane Co. has already informed plaintiff that it is not aware of the sale of any Crane Co. product to the plaintiff's job sites. See Crane Co.'s Responses to Plaintiffs'

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Requests for Admission to Defendant Crane Company and Crane Co.'s Responses to Plaintiffs' Supplemental Interrogatories and Requests for Production of Defendant, Crane Company.

- Q92. If your response to subpart (h) above is in the affirmative, state, for each such jobsite;
- a. the basis of your knowledge;
 - b. the type, brand name, manufacturer and quantity used for each such asbestos containing product;
 - c. whether the asbestos containing products were;
 - 1. purchased by you; and/or
 - 2. used by you;
 - d. who you purchased the products from;
 - e. whether the asbestos containing products were supplied or furnished to the jobsite by you or delivered to the jobsite to your attention.

A92. See objections and response to Interrogatory No. 92.

- Q93. For each jobsite listed in response to Interrogatory 91, state the name, title and union affiliation of each person employed by you on that job.

A93. See objections and response to Interrogatory No. 92.

- Q94. Please identify:

- a. each present or former employee of yours who has been both employed by you (concerning the sale, promotion, development, research and safety of asbestos-containing products or materials) and who was also a present or former employee of any other defendant in this litigation or any other company which manufactured, processed, developed, sold, distributed or supplied asbestos-containing products or materials;
- b. with respect to each person identified, please identify their former employer, their title and duties and responsibilities as an employee of any other defendant in this litigation or any other company which manufactured, processed, developed, sold, distributed, or supplied asbestos-containing products or materials;
- c. with respect to each person, please identify, their title and duties and responsibilities as an employee of yours and the inclusive dates of their employment with you; and,

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- d. their title and duties and responsibilities as an employee of any other defendant in this litigation or any other company, and the inclusive dates of their employment with that other defendant or other company, if applicable.

A94. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome because Crane Co. does not have the resumes of all of its former employees. See Preliminary Statement, Section B.

Q95. Has this defendant ever placed any warranties, guarantees or other such representations on any of its asbestos or asbestos-containing products or materials, or on or in the containers in which those products were sold, distributed or supplied at any time from 1930 to the present? If so, then for each asbestos product or material, please identify:

- a. the product or material;
- b. the inclusive dates on which each warranty, guarantee, or other representation appeared on or with the product or on or in the product's container;
- c. the exact content of each warranty, guarantee or other representation;
- d. the location on the product or container where each warranty, guarantee, or other representation was placed;
- e. if the content or placement of any warranty, guarantee or other representation was ever changed, and if so, then for each change:
 - 1. the nature of the change;
 - 2. the date when the content or placement of the warranty, guarantee, or other representation was changed;
 - 3. the reason for change; and
 - 4. the inclusive dates during which the changed warranty, guarantee or other representation appeared on or with the product of its container;
- f. the name and title of each of your present or former highest supervisory employees with knowledge of the decision to place any of the aforementioned warranties, guarantees or other representations or the decision to place any of them on or with your asbestos products.

A95. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome and it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it never made any warranties or guarantees regarding asbestos. See Preliminary Statement, Section B.

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A96. Did this defendant make any representation at any time from 1930 to the present that the use of asbestos in any of its products or materials made these products superior, in any way, to any asbestos-free product or material intended for the same or similar use? If so, then with respect to each representation, indicate:

- a. the date or dates on which the representation was made;
- b. its exact content;
- c. the manner in which it was communicated. In lieu of answering subpart (b), you may attach a copy of the representation to these answers.

A96. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome and it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Crane Co. also objects to this Interrogatory to the extent it implies that Crane Co. manufactured asbestos-containing products. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not make any representation regarding the use of asbestos versus non-asbestos containing components. See Preliminary Statement, Section B.

Q97. Did this defendant make any representations at any time from 1930 to the present that the use of asbestos or the use of its asbestos-containing products or materials was safe, harmless or not dangerous. If so, then with respect to each representation indicate:

- a. the date or dates on which it was made;
- b. its exact content;
- c. the manner in which it was communicated. In lieu of answering subpart (b), you may attach a copy of the representation to these answers.

A97. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to these actions, and because it is overly broad and not reasonably calculated to lead to the discovery of admissible evidence, as it is not limited to alleged asbestos-related hazards. Crane Co. further objects to this Interrogatory to the extent it implies that there were any health hazards involved with its products. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it is not aware of any information responsive to this Interrogatory. By way of further answer, Crane Co. did not believe that any product it sold was hazardous when used as intended. See Preliminary Statement, Section B.

Q98. Please give the name and address of each person between 1930 and 1967 who had the responsibility for following any new developments or new learning concerning industrial hygiene as it related to your products, indicating whether such person is still alive or not.

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A98. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it is not aware of any such person with respect to asbestos issues. See Preliminary Statement, Section B.

Q99. Please identify, including in your identification, the name and address of the person who has custody of such records, all records which relate to the subject matter of the answers to Interrogatories No. 28.

A99. See objections and response to Interrogatory No. 28.

Q100. Between 1930 and 1967, did any trade association to which the defendant belonged hold any meetings (including committee meetings), send any written material of any kind to any of its members, or send any communication to the defendant, concerning a possible, probable or alleged association between exposure to asbestos dust and any pulmonary disorder or disease.

A100. Crane Co. objects to this Interrogatory because it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, it did not receive the type of information requested in this Interrogatory. See Preliminary Statement, Section B.

Q101. If you answered the previous Interrogatory No. 100 in the affirmative, please identify each such meeting, written material or communication by giving for each:

- a. the date;
- b. the place of such meeting or origination of such written material or communication;
- c. the names and addresses of all persons involved in any way;
- d. the subject matter of each.

A101. See objections and response to Interrogatory No. 100.

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Q102. Please identify by giving its date, the names and addresses of the author and the person to whom it was directed, each and every document, memorandum, letter or writing of any kind addressed to or written by any employee of the defendant concerning any possible, probable, or alleged association between exposure to asbestos dust and any pulmonary disease or disorder, written between January 1, 1930 and January 1, 1968.

A102. See objections and response to Interrogatory No. 100.

Q103. Please identify defendant's workers compensation, disability and or health insurance carriers or adjusters (if self-insured) from 1930 to the present. For each insurer please state:

- a. type of coverage;
- b. dates of coverage;
- c. whether defendant's rates were increased due to health hazards associated with defendant's employees exposure to asbestos containing products;
- d. whether any insurance company has denied coverage to you or any subsidiary or division because of asbestos dust conditions at your plant, employee lung disease complaints or any other reason related to asbestos;
- e. if yes, identify the insurance carrier, the reason for the denial and the dates of each denial.

A103. Crane Co. objects to this Interrogatory on the grounds that it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. To the best of Crane Co.'s present knowledge, plaintiff in this action has not alleged that he worked at or was exposed to asbestos-containing products at a Crane Co. facility.

Q104. Between 1930 and 1968, did the defendant require or suggest that its employees take any precautions against the inhalation of asbestos dust.

A104. Crane Co. objects to this Interrogatory on the grounds that it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. To the best of Crane Co.'s present knowledge, plaintiff in this action has not alleged that he worked at or was exposed to asbestos-containing products at a Crane Co. facility. Subject to and without waiving the foregoing objections, to the best of Crane Co.'s present knowledge, no. See Preliminary Statement, Section B.

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Q105. If you answered the previous Interrogatory No. 104 in the affirmative, for each such precaution please state:

- a. the date that each was first required or suggested;
- b. a full description of each such precaution;
- c. the reason(s) why each precaution was suggested or required;
- d. the name and address (indicating whether living or dead) of the person or persons responsible for requiring or suggesting each such precaution.
- e. a full statement of the wording of each such suggestion or rule requiring each precaution.

A105. See objections and response to Interrogatory No. 104.

Q106. If you contend that the defendant could not have known prior to: (a) 1940; (b) 1950; or (c) 1960 that exposure to asbestos dust by workers who worked with or around asbestos products could cause pulmonary injuries or disease, please state, in detail, all the facts on which the defendant relies to support such a contention.

A106. Crane Co. objects to this Interrogatory because it is overly broad and unduly burdensome, in that it seeks speculation and it seeks to require Crane Co. to provide facts to support a negative. Subject to and without waiving the foregoing objections, Crane Co. did not believe that any product it sold was hazardous when used as intended.

Q107. Have you ever had asbestos removed or abated from any building you own? If so, please state why it was removed, who decided it would be removed, and identify all documents which concern the decision and implementation of the removal.

A107. Crane Co. objects to this Interrogatory on the grounds that it seeks information that is not relevant to this action and it is not reasonably calculated to lead to the discovery of admissible evidence. To the best of Crane Co.'s present knowledge, plaintiff in this action has not alleged that he worked at or was exposed to asbestos-containing products at a Crane Co. facility.

Q108. Do you contend that there is any difference between chrysotile fiber, amosite fiber, crocidolite fiber and/or tremolite fiber in the development of mesothelioma or lung cancer? If so, explain in detail your contention as to the distinction between or among fiber types in the development of each disease.

A108. Crane Co. objects to this Interrogatory on the grounds that it assumes facts not in evidence. Crane Co. does not consider itself competent to offer opinions as

IN RE: BRIDGEPORT ASBESTOS LITIGATION

to causal relationships, if any, between various substances and alleged disease processes. Crane Co. must defer to the reasoned judgment and opinions of expert witnesses on all questions of human disease, its cause, and its diagnosis.

Subject to and without waiving the foregoing objections, to Crane Co.'s present information and belief, there is no single mineral known as "asbestos". Rather, "asbestos" is a name which has been given to a group of minerals, each differing from the other physically, chemically, and in biologic effect. Further, it is Crane Co.'s present information and belief that "asbestos" in all its forms and uses does not pose a risk of harm to all humans in all circumstances; in other words, simply being in the area of asbestos or "exposures" to all types of asbestos does not necessarily result in disease. Throughout the relevant time period the American Conference of Governmental Industrial Hygienists "ACGIH" has published threshold limit values for a variety of substances including "asbestos". The ACGIH threshold limit values are premised on the medical assumption that a human may be exposed to "asbestos" in an amount lower than the TLV for a working lifetime without the production of disease. Since approximately 1971 an agency of the U.S. Government, OSHA, has published Permissible Exposure Limits for "asbestos" which are premised upon the same medical assumption that a human may be exposed to "asbestos" in an amount lower than the PEL for a working lifetime without the production of disease.

Q109. Prior to answering these Interrogatories, have you made due and diligent search of all books, records and papers as well as diligent inquiry of all agents and employees of defendant to elicit all possible relevant information. If yes, please identify what records or books and papers were searched and what agents and employees were questioned.

A109. See Preliminary Statement, Sections A and B.

By 
Frederick B. Tedford
Danaher, Tedford, Lagnese & Neal, P.C.
700 Capitol Place
21 Oak Street
Hartford, Connecticut 06106
(860)247-3666

VERIFICATION

STATE OF CONNECTICUT §
COUNTY OF FAIRFIELD §

BEFORE ME, the undersigned authority, on this date personally appeared Anthony D. Pantaleoni, a duly authorized representative of Crane Co., who being by me first duly sworn on oath says that the information provided in Crane Co.'s Responses to Plaintiffs' Interrogatories is true and accurate to the best of his knowledge, information, belief, and as he is informed by others based upon a review of existing business records and interviews of former employees of the company.

P. D. Pantaleoni
Anthony D. Pantaleoni

Sworn to and subscribed before me this 29th day of April, 2003, to certify which witness my hand and seal of office.

Lenora Rowser
Printed Name: LENORA ROWSER
Notary Public, State of Connecticut

My commission expires:
LENORA ROWSER
NOTARY PUBLIC
MY COMMISSION EXPIRES DEC. 31. 2004