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IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

VIGNETT KOLODOSKI,	)	Case No. CV-94-05-1443
	)	
Plaintiff,	)	Judge Maureen O'Connor
	)	
-vs-	)	
	)	THE BFGOODRICH COMPANY'S
THE BFGOODRICH COMPANY, et al.,	)	ANSWERS AND OBJECTIONS TO
	)	PLAINTIFF'S FIRST SET OF
Defendants.	)	INTERROGATORIES TO DEFENDANT

Defendant The BFGoodrich Company (the "Company") answers and/or objects to Plaintiff's First Set of Interrogatories the Company in accordance with the Ohio Rules of Civil Procedure as follows:

INTERROGATORIES

1. Identify by name, address, and summary of testimony, any and all lay witnesses and/or expert witnesses expected to testify on behalf of Defendant at the trial of the within action.

ANSWER:

(1) Marilyn Petroski, Sr. Workers' Compensation Administrator, The BFGoodrich Company, 3925 Embassy Drive, Akron, Ohio 44333-1799. Ms. Petroski will testify regarding personnel records.

(2) Harold W. Dietz, M.D., 226 Hampshire Road, Akron, Ohio 44313. Dr. Dietz may testify regarding the issue of occupational exposure to asbestos at the 500 South Main Street facility.

ingredients occurred. Some asbestos storage occurred in Building 23, where the compounding of ingredients used in the manufacture of bowdomes stock took place. The specific dates on which such storage, usage, and disposal took place are not known.

c. Whether any such product(s) existed at or in any work location, department or building at which Stanley Kolodoski worked, and if so, identify each location and each product at that location.

ANSWER:

To the best of the Company's knowledge, if asbestos existed in any of the locations, departments, or buildings in which Plaintiff worked, it likely would have been contained in pipe insulation, or in certain pieces of machinery placed in such location. However, the Company is not certain that either the pipe insulation or the machinery used in the locations where the Plaintiff worked contained asbestos. Further answering, documents have been produced to Plaintiff which detail the locations of asbestos abatement in the facility located at 500 South Main Street, Akron.

4. For each product identified in Interrogatory No. 3, describe:

a. The function(s) or purpose(s) for which it was or is used in Defendant's business operations;

ANSWER:

Asbestos, when used in the facility or manufacturing process, is generally used for its thermal characteristics, such as insulation, heat retardation, etc.

b. Any and all safety equipment or devices provided by Defendant to any employee in connection with its storage, use, handling, or disposal, and the inclusive dates that such equipment or devices were provided or made available to employees.

ANSWER:

Dust masks were furnished to employees. The Company required mandatory respirator usage by those of its employees who worked directly with asbestos or products containing asbestos since at least 1975. The Company uses half facepiece cartridge respirators and self-contained positive pressure breathing apparatus. The most recent respirators were called Comfo-II's, manufactured by MSA. Prior to that, respirators were purchased from Willson. At a later date (some time in the 1970's), the Company also provided protective clothing to employees working directly with asbestos.

5. Did Defendant perform, direct to be performed, finance, sponsor or receive the results of any studies or tests concerning the relationship between the exposure to asbestos, talc/soapstone, and/or asbesti-form materials and any respiratory disease or condition.

ANSWER:

No.

6. Please list all manufacturers or distributors from whom you purchased raw asbestos fiber, talc/soapstone, and/or asbestos-containing products, the quantities that were purchased, the entities from whom its (sic) was purchased, and the plant locations where it was used.

ANSWER:

To the best of the Company's knowledge, if raw asbestos fiber was purchased for use at the 500 South Main Street plant, it may have been supplied by the following manufacturers: 0Union Carbide, Asbestos Corporation, Ruberoid, Carey Canada, Manville, J.M. Asbestos, and KCAC. Exact quantities and plant locations are not known. Further answering, all available documents responsive to this request have been previously produced.

7. Have you ever performed, directed to be performed, or received the results of dust monitoring tests in your Summit County facilities?

ANSWER:

Yes.

8. If the answer to Interrogatory No. 7 is in the affirmative, please state the dates and results of such tests or studies.

ANSWER:

The Company has performed dust monitoring tests in the Akron complex since at least the mid-1940's. These tests were not performed at specific intervals, but were performed on an ongoing basis to determine whether dust levels at the facility exceeded the levels set out in standards prepared first by an industry organization known as ACGIH, and later, OSHA. The test results were generally taken by the Industrial Hygiene Department of the Company, which did write up the results of such tests.

evidence. Further answering and without waiving the foregoing objection, the Company answers "yes."

19. If the answer to Interrogatory No. 18 is in the affirmative, state the result of all inspections since 1945.

ANSWER:

Objection. The information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Further answering and without waiving the foregoing objection, the Company states on March 18, 1980, the EPA conducted a compliance audit of handling of asbestos in the adhesive business. It does not appear that any citations were issued against the Company arising out of that audit. See Exhibit 3.

20. Please state the names and addresses of each and every individual that was employed as an industrial hygienist and/or physician in Defendant's Summit County facilities between the years 1945 and 1980.

ANSWER:

Dr. Rex H. Wilson	1946-1974, deceased
Dr. Arnold V. Gold	1966-1977, deceased
Dr. Richard A. Guyton	1974-1988, retired, last known address - 692 Pine Point, Akron, Ohio 44333
Dr. Maurice N. Johnson	1972-1985, retired, address unknown
Dr. Harold W. Dietz	1976-1991, retired, last known address - 226 Hampshire Road, Akron, Ohio 44313

Dr. Charles T. Disney	1974-1975, deceased
Dr. Harold E. May	1974-1987, retired, last known address - 2219 Woodpark Road, Akron, Ohio 44313
Dr. Charles Wintrup	1967-1972, deceased
Dr. Carolyn McCann	1977-1986, terminated. Current address unknown.
Dr. Edson Freeman	1973-1980, terminated, last known address - 2243 Woodpark Road, Akron, Ohio 44333
Dr. John Spillane	dates of service unknown, deceased
Dr. D.B. Lowe	193?-1946, retired, deceased
Dr. F.R. Stees	Dates of service unknown, est. 1945, deceased
Dr. J.H. Pollock	est. 1955, currently in private practice in Akron, Ohio, last known address - 750 West Market Street, Akron, Ohio
Dr. Glenn Hough	date of service unknown, status unknown, but believed deceased
Dr. George Donnelly	1955-1962, deceased
Dr. Ernest H. Planck II	1954-1967, deceased
Dr. Harold Reed	1954-1967, deceased
Dr. I.R. Birnbaum	early '70's, deceased
Dr. Zadinsky	early '60's, status unknown, but believed deceased
Dr. Ralph W. Jacobs	est. 1954, status unknown
Dr. Robert Scarcella	1980-1981, last known business address - 185 West Cedar Street, Akron, Ohio 44307
McCormick, W.E.	1946-1973, retired, last known address - 419 Dorchester Road, Akron, Ohio 44320

Wilson, George	late '60's, terminated, address unknown
Bialke, Tom	terminated 1989, last known address - 1555 Kingsley, Akron, Ohio 44313
Shepler, Tom	dates of service, address unknown, terminated
Nash, Bob	dates of service, address unknown, terminated
Kennedy, Mark	dates of service, address unknown, terminated
Hodgson, Betty	dates of service, address unknown, terminated
Modrell, Bob	retired 1989, last known address - 2229 East Santom Road, Stow, Ohio 44224
Katzenmeyer, Ed	dates of service, address unknown, terminated
Born, John	retired 1989, last known address 7660 Winding Way, Brecksville, Ohio 44141
McCool, John	dates of service, address unknown, terminated
Carter, Richard	late '60's, address unknown
Callender, Ronald	late '60's, address unknown

21. **[Incorrectly numbered by Plaintiff as 22]**

For each and every asbestos-containing product manufactured by Defendant between the years 1945 and 1980, please state the name of such product, when such product was manufactured, where such product was manufactured, and describe each of such product.

ANSWER:

Objection. The decedent worked only at the Company's 500 South Main Street facility. Any information sought regarding other facilities is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Further answering and without waiving the foregoing objection, and limiting its answer to the 500 South Main Street facility, the Company states as follows:

Product Name	Dates of Manufacture	Description
Hose	1965- early 1970's	Type unknown
Sheet rubber/sheet packing	1939-1960	Gasket material for high temperative applications
Bonding films	Various, depending on type, 1965-present	Used to bond metal to metal
Roof coating and construction adhesives	1955-present	Adhesive produce
Expander brake tubes	1963-early 1970's	Aircraft brake assembly part
Phoenix rocket insulators	1960-1986	Insulating rubber for inside rockets that contain propellants

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As to Objections:

Sarah J. Cruise

Sarah J. Cruise
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The BFGoodrich Company