



DAVID C. ANDERSON, ESQ.
 ROPERS, MAJESKI, KOHN,
 BENTLEY, WAGNER & KANE
 670 Howard Street
 San Francisco, California 94105
 (415) 573-4800

Attorneys for Rome Cable Corporation

SUPERIOR COURT CALIFORNIA

COUNTY OF SAN FRANCISCO

IN RE: COMPLEX	)	ROME CABLE CORPORATION'S
	)	RESPONSE TO PLAINTIFFS'
ASBESTOS LITIGATION	)	STANDARD INTERROGATORIES

Defendant Rome Cable Corporation ("Rome") hereby
 responds and objects to Plaintiff's Standard Interrogatories
 (the "Interrogatories"):

I

General Objections

1. Rome objects to the Interrogatories on the ground
 that it was not a party to any action in San Francisco Superior
 Court on June 21, 1985 when General Order No. 29 was issued and
 did not receive notice of the application for consolidated
 discovery and has had no opportunity to be heard with regard to
 that order or the form of discovery propounded under it. In
 addition, the Civil Discovery Act of 1986, C.C.P. Section 2016
et. seq. (the "Civil Discovery Act"), which became effective on

1 July 2, 1987, superceded General Order No. 29. Thus, Rome
2 objects to the Interrogatories to the extent that they do not
3 comply with the Civil Discovery Act or are in violation of the
4 Order Amending General Order No. 43.

5 2. Rome further objects on the ground that the
6 Interrogatories together with their subparts exceed the
7 statutory number permitted by C.C.P. 2030(c) and plaintiffs
8 have not attached to the Interrogatories a Declaration for
9 Additional Discovery pursuant to C.C.P. § 2030(c)(3).

10 3. Rome further objects to each Interrogatory
11 insofar as any of them purport to require information outside
12 the possession, custody or control of Rome.

13 4. Rome further objects to the "Definitions" which
14 preface the Interrogatories on the ground that they do not
15 comply with the requirement of C.C.P. § 2030(c)(5).

16 5. Rome further objects to the defined terms within
17 each question on the ground that by inclusion of such terms,
18 the question is not full and complete in and of itself and
19 therefore violates C.C.P. § 2030(c)(5).

20 6. Rome further objects to the Interrogatories to
21 the extent that they contain subparts, or are disjunctive,
22 conjunctive, or compound questions, in violation of C.C.P.
23 § 2030(c)(5).

24 7. Rome further objects to the Interrogatories to
25 the extent that, considering the Rome products to which
26 plaintiff or plaintiff's decedent has alleged exposure, if any,
27 they are overbroad as to time or geography and therefore seek
28

1 information which is irrelevant to the subject matter of this
2 action and not reasonably calculated to lead to the discovery
3 of admissible evidence.

4 8. Rome further objects to the Interrogatories to
5 the extent that they seek information concerning products other
6 than the products to which plaintiff or plaintiff's decedent
7 has alleged exposure and therefore seek information which is
8 irrelevant to the subject matter of this action and not
9 reasonably calculated to lead to the discovery of admissible
10 evidence.

11 9. Rome further objects to the Interrogatories to
12 the extent that they seek "corporate knowledge" because it is
13 impossible for Rome to set forth the collective knowledge of
14 all of its past and present employees. Such Interrogatories
15 are unjustly burdensome and oppressive. The information
16 provided in response to the Interrogatories has been assembled
17 by employees and counsel of Rome. It is not possible to state
18 that all information responsive to the Interrogatories has been
19 discovered. Investigation continues and Rome reserves the
20 right to revise, correct, supplement and amend its responses to
21 provide information subsequently discovered.

22 Rome does not waive any objection it may have whether
23 or not asserted herein to any of the Interrogatories or to the
24 admission of the Interrogatories or Rome's responses thereto at
25 trial.

26 The foregoing General Objections are specifically made
27 a part of and incorporated by reference into each of the
28 responses set forth below.

II

Interrogatory No. 1

With respect to the individual verifying these answers on your behalf, state the following:

- (a) Their name;
- (b) Their present business address;
- (c) Their present job title;
- (d) Their date of first employment with you, and the dates and titles of each job position they have held while they were employed by you.

Answer:

See General Objections. Without waiving its objections, Rome responds:

- (a) Francis E. LaGase.
- (b) Rome Cable Corporation, 421 Ridge Street, Rome, New York.
- (c) Manager - Product Engineering.
- (d) First employed in June 1960.
 - 1960-1963 - Product Engineer;
 - 1969-1970 - Senior Product Engineer
 - 1970-1975 - Manager, Communication and Instrumentation
 - 1975-1985 - Product Engineer Manager
 - 1985-present - Manager, Product Engineering

Interrogatory No. 2

Please state whether or not you are a corporation, and if so, state:

- (a) Your correct corporate name;
- (b) Your state of incorporation;
- (c) The date of your incorporation;
- (d) The address of your principal place of business;

(e) Whether or not you have ever held a certificate of authority to do business in this state, and if so, the inclusive dates of any certificate;
(f) Whether or not you have a registered agent for the purpose of accepting service of process in this state, and if so, their name and present address;
(g) If you are wholly owned or the majority interest of your company is owned by another business entity, state that entity's name and principal place of business.

Answer:

See General Objections. Without waiving its objections, Rome responds: Yes.

(a) Rome Cable Corporation.

(b) Delaware.

(c) On or about May 29, 1979.

(d) 421 Ridge Street, Rome, New York.

(e) Yes, since on or about June 25, 1979.

(f) Yes. CT Corporation System, 818 West 7th Street, Los Angeles, California.

(g) Rome Group, Inc., 421 Ridge Street, Rome, New York.

Interrogatory No. 3

Have you ever been identified, known, or done business under any other name? If so, please state such name or names and the time period during which this defendant was so known or identified.

Answer:

See General Objections. Without waiving its objections, Rome responds: A company known as Rome Cable Corporation was first organized in or about 1936 as a manufacturer of wire and cable products. ALCOA acquired Rome

1 Cable Corporation in or about 1959. Cyprus Mines Corporation
2 purchased Rome Cable Corporation in or about 1967 from ALCOA
3 and changed the name of the company to Cyprus Wire & Cable
4 Company, although the Rome Cable brand name was retained.

5 The current Rome Cable Corporation was incorporated in
6 Delaware on or about May 29, 1979 as RCD Purchase Corp. In or
7 about July 1979, Rome purchased the operating assets of Cyprus
8 Wire & Cable Division of Cyprus Mines Corporation.

9
10 **Interrogatory No. 4**

11 State whether you have controlled, purchased, or in
12 any way acquired any interest in any corporation or business
13 entity which has mined, manufactured, produced, processed,
14 compounded, sold, supplied, distributed and/or otherwise placed
15 asbestos or asbestos-containing products in the stream of
16 commerce, and if so, state:

- 17
- 18 (a) The name and address of said corporation or
19 business entity;
 - 20 (b) The dates you controlled, purchased or acquired
21 any interest; and
 - 22 (c) Set forth the nature of the business as it
23 pertains to asbestos.

24
25 **Answer:**

26 See General Objections. Without waiving its
27 objections, Rome responds: No.

28
29 **Interrogatory No. 5**

30 Since 1930, at any time did you own any shares of
31 stock or otherwise have an ownership interest in a company that
32 either mines, produces, or sells raw asbestos fiber? If the
33 answer is in the affirmative, state the following:

- 34
- 35 (a) The name of such corporation or entity;
 - 36 (b) The date of incorporation or charter;
 - 37 (c) The state or country of incorporation;
 - 38 (d) Each ownership interest owned in each
39 corporation, setting forth any change in such
40 interest;
 - 41 (e) The date such interest was acquired;
 - 42 (f) The date of formation of such corporation or
43 entity;

- 1 (g) The names of all shareholders owning more than 5%
2 of the shares of stock of such corporation;
3 (h) The date such interest changed or terminated, if
4 applicable;
5 (i) The name and location of each asbestos mine so
6 owned;
7 (j) The grade and type of asbestos mined at each mine.

8 Answer:

9 See General Objections. Rome further objects to this
10 Interrogatory on the ground that the term "otherwise have an
11 ownership interest in" is vague and ambiguous. Without waiving
12 its objections, Rome responds: No.

13 Interrogatory No. 6

14 Please state the following:

- 15 (a) The address where the corporate records of this
16 defendant are currently located; and
17 (b) The name, job title, and current address of the
18 custodian for this defendant's corporate records.

19 Answer:

20 See General Objections. Without waiving its
21 objections, Rome responds:

22 (a) Rome's corporate records are located at its
23 principal place of business, 421 Ridge Street, Rome, New York,
24 and at the offices of its attorneys, Jacobs Persinger & Parker,
25 77 Water Street, New York, New York.

26 (b) Rome does not have a "custodian of records,"
27 although several employees have the responsibility of filing
28 and maintaining documents prepared or received by various
departments.

Interrogatory No. 7

Please state whether this defendant, between 1930 and
1985, has ever engaged in the following activities with regard

1 to raw asbestos fiber, and if so, please state the inclusive
2 dates of such activity:

- 3 (a) Mining;
- 4 (b) Milling;
- 5 (c) Supply;
- 6 (d) Importing;
- 7 (e) Processing;
- 8 (f) Distribution;
- 9 (g) Marketing;
- 10 (h) Sale.

11 **Answer:**

12 See General Objections. Without waiving its
13 objections, Rome responds: No.

14 **Interrogatory No. 8**

15 Please state whether this defendant, between 1930 and
16 1985, has ever engaged in the following activities with regard
17 to **asbestos-containing products**, and if so, please state the
18 inclusive dates of such activity:

- 19 (a) Supply;
- 20 (b) Importing;
- 21 (c) Distribution;
- 22 (d) Marketing;
- 23 (e) Sale;
- 24 (f) Labelling;
- 25 (g) Manufacturing.

26 **Answer:**

27 See General Objections. Without waiving its
28 objections, Rome responds: Rome cannot respond to this
Interrogatory with specificity since manufacturing and sales
records do not exist; Rome, however, believes that it
manufactured cable products with insulation containing
encapsulated and saturated asbestos between 1964 and 1980.

29 **Interrogatory No. 9**

30 If your answer to Interrogatory No. 7 regarding "raw
31 asbestos fiber" is in the affirmative, please state the
32 following:

- 33 (a) The trade, brand name, and/or generic name of
34 each such raw asbestos fiber mined, milled,

1 supplied, distributed, processed, imported,
2 labelled, and/or marketed in any form or quantity
3 between 1930 and 1985;

- 4 (b) The date(s) each such raw asbestos fiber was
5 first placed on the market, including the date(s)
6 each such raw asbestos fiber was first marketed:
7 (i) on an experimental basis;
8 (ii) on a test basis; or
9 (iii) for sale.
- 10 (c) The date(s) each such raw asbestos fiber:
11 (i) ceased to be produced; or
12 (ii) was recalled from the market, if ever.
- 13 (d) A description of the chemical composition of each
14 such raw asbestos fiber, including the type
15 and/or grade of asbestos;
- 16 (e) A description of the physical appearance and
17 nature of each such raw asbestos fiber, including
18 any color coding, distinctive marking and/or logo;
- 19 (f) A detailed description of the intended use of
20 each such raw asbestos fiber, including any
21 temperature limits for each such use;
- 22 (g) Whether such raw asbestos fiber was on the U.S.
23 Government's "Qualified Products List", and if
24 so, the inclusive dates it was on such list;
- 25 (h) Whether any of this defendant's "raw asbestos
26 fibers" have, at any time, been sold to any
27 companies (including power companies or
28 utilities), shipyards, distributors, refineries,
suppliers and/or manufactures in the defined
geographic area. If so, please state:
(i) The names of each such company, shipyard,
distributor, supplier, manufacturer or
refinery;
(ii) The inclusive dates of each such sale, and
the amount (volume) and the trade or brand
name of each such raw asbestos fiber sold;
(iii) Whether you have any records indicating any
such sale and, if so, the name, address and
job classification of each individual who
currently has possession of such records.
- (i) Describe the types of records sufficiently to
identify them for discovery purposes which set
forth any of the foregoing information and the
custodian thereof (giving name and address) of
each such records.

Answer:

See General Objections. Without waiving its
objections, Rome responds: Not applicable.

1 Interrogatory No. 10

2 If your answer to Interrogatory No. 8 regarding
3 "asbestos-containing products" is in the affirmative, please
state the following:

- 4 (a) The trade, brand name, and/or generic name of
each such asbestos-containing product sold,
5 supplied, distributed, processed, imported,
labelled, manufactured, and/or marketed in any
6 form or quantity between 1930 and 1985;
- 7 (b) The date(s) each such asbestos-containing product
was first placed on the market, including the
8 date(s) each such asbestos-containing product was
first marketed:
9 (i) on an experimental basis;
10 (ii) on a test basis or
11 (iii) for sale.
- 12 (c) The date(s) each such asbestos-containing product:
13 (i) ceased to be produced; or
14 (ii) was recalled from the market, if ever.
- 15 (d) A description of the chemical composition of each
such asbestos-containing product, including the
16 type and/or grade of asbestos and/or asbestos
17 fiber contained in each such product and the
18 quantitative percentage of asbestos or asbestos
19 fiber in each such product;
- 20 (e) A description of the physical appearance and
nature of each such asbestos-containing product,
21 including any color coding, distinctive marking
and/or logo;
- 22 (f) A detailed description of the intended use of
each such asbestos-containing product, including
23 any temperature limits for each such use;
- 24 (g) Whether any such asbestos-containing product was
on the U.S. Government's "Qualified Products
25 List", and if so, the inclusive dates it was on
such list;
- 26 (h) The name and address of the supplier's of the raw
asbestos fiber used in each such product and the
27 time period of such supply;
- 28 (i) Whether any of this defendant's
"asbestos-containing products" have, at any time,
been sold to any companies (including power
companies or utilities), shipyards, distributors,
refineries, suppliers and/or manufacturers in the
defined geographic area. If so, please state:
29 (i) The names of each such company,
shipyard, distributor, supplier,
30 manufacturer or refinery;
31 (ii) The inclusive dates of each such sale,
and the amount (volume) and the trade
or brand name of each such
asbestos--containing product sold;

- (iii) Whether you have any records indicating any such sale and, if so, the name, address and job classification of each individual who currently has possession of such records.
- (j) Describe the types of records sufficiently to identify them for discovery purposes which set forth any of the foregoing information and the custodian thereof (giving name and address) of each such records.

Answer:

See General Objections. This interrogatory requests information concerning products manufactured during the period 1930 through 1985. Because the Interrogatory is not limited to products allegedly used by plaintiff or plaintiff's decedent, and plaintiff has not alleged exposure to any product manufactured by Rome, the information sought is either impossible to ascertain or so burdensome to produce as to render the Interrogatory unjust, harassing, annoying and oppressive. Without waiving its objections, Rome responds: Rome will attempt to provide information for products identified by plaintiff or plaintiff's decedent. Rome believes that between 1964 and 1980 it manufactured small quantities of cable products with insulation containing encapsulated and saturated asbestos. The products included power cables, aluminum conductors and control cables.

(b)(i)-(iii) See Answer to Interrogatory No. 10(a).

(c)(i) See Answer to Interrogatory No. 10(a).

(c)(ii) See Answer to Interrogatory No. 10(a).

(d) It would be unduly burdensome to provide the chemical composition of each asbestos-containing product identified in response to Interrogatory No. 10(a). Moreover,

1 cable manufactured by Rome was made according to various
2 specifications and therefore without referring to a specific
3 order it is impossible to answer this subpart. Without waiving
4 its objection, Rome responds: Rome will attempt to provide
5 information for products identified by plaintiff or plaintiff's
6 decedent.

7 (e) It would be unduly burdensome to provide
8 information regarding the "nature" of each of the
9 asbestos-containing products identified in response to
10 Interrogatory No. 10(a). Without waiving its objections, Rome
11 responds: Rome will attempt to provide information for
12 products identified by plaintiff or plaintiff's decedent. In
13 general, all of the asbestos-containing cable identified in
14 response to Interrogatory No. 10(a) was round and black or
15 grey. Certain control and power cables are believed to have
16 had a black jacket printed with a legend.

17 (f) It would be unduly burdensome to provide detailed
18 information regarding the intended use of each of the
19 asbestos-containing products identified in response to
20 Interrogatory No. 10(a). Without waiving its objection, Rome
21 responds: Rome will attempt to provide this information for
22 products identified by plaintiff or plaintiff's decedent. In
23 general, all of the asbestos-containing products identified in
24 response to Interrogatory No. 10(a) were intended to be used as
25 heat and flame retardant control and power cables. The maximum
26 temperature limit for such use would have been 90°C.
27
28

1 (g) None of the asbestos-containing products
2 identified in response to Interrogatory No. 10(a) were listed
3 on the U.S. Government's Qualified Products List.

4 (h) Rome was not supplied with "raw asbestos" fiber.
5 Rome was supplied with asbestos paper/mylar laminate tape by
6 Chase & Sons, Randolph, Massachusetts and New England Printed
7 Tape Co., Pawtucket, Rhode Island, and with non-fraying
8 asbestos braiding yarn by Raybestos-Manhattan, Inc.,
9 Bridgeport, Connecticut.

10 (i) Sales records of the products identified in
11 response to Interrogatory No. 10(a) were not retained.
12 Accordingly, Rome has insufficient information to respond to
13 this subpart.

14 (j) See Answer to Interrogatory No. 10(i). Rome's
15 plant manufacturing specifications are maintained by Rome's
16 Plant Specification Section, Manufacturing Department, Rome
17 Cable Corporation, 421 Ridge Street, Rome, New York.

18 **Interrogatory No. 11**

19 If any of the distributors identified in your answer
20 to Interrogatory Nos. 9 and 10 above was an exclusive
21 distributorship, please so state and identify the relevant time
22 period.

22 **Answer:**

23 See General Objections. Without waiving its
24 objections, Rome responds: Not applicable.

25 **Interrogatory No. 12**

26 If this defendant entered into any agreements for the
27 rebranding of any asbestos-containing product(s) and/or
28

1 material(s) mined, imported, manufactured, sold, distributed,
2 and/or supplied by this defendant for resale or distribution by
3 another company, describe each agreement's terms and the
4 parties to said agreement, the duration of the agreement, and
5 name of each product(s) and/or material(s) covered by each such
6 agreement.

7 **Answer:**

8 See General Objections. Rome further objects to this
9 Interrogatory on the ground that the term "rebranding" is vague
10 and ambiguous. Without waiving its objections, Rome responds:
11 No.

12 **Interrogatory No. 13**

13 If this defendant entered into any agreements for the
14 rebranding of asbestos-containing products and/or materials
15 mined, imported, manufactured, sold, distributed, and/or
16 supplied by another company for resale or distribution by your
17 company, describe each of the agreements and the parties to
18 said agreement, the terms, the duration, and the names of each
19 product(s) and/or material(s) covered by each such agreement.

20 **Answer:**

21 See General Objections. Without waiving its
22 objections, Rome responds: Not applicable.

23 **Interrogatory No. 14**

24 State whether any asbestos used, processed, mined,
25 manufactured, imported, supplied, distributed, labelled, and/or
26 sold by this defendant was purchased from or acquired from the
27 General Service Administration or any branch or agency of the
28 United States government during the period 1930 to 1985. If
your answer is in the affirmative, state:

- 29 (a) The name and address of the agency which supplied
the asbestos;
- 30 (b) The grade and types of asbestos purchased or
acquired;
- 31 (c) The quantities of each type of asbestos purchased
or acquired annually during the period 1930 to
1985;
- 32 (d) The means of packaging;
- 33 (e) The health warnings, if any, which accompanied
each shipment of asbestos, and indicate when said
warnings were first made part of the shipments.

1 **Answer:**

2 See General Objections. Without waiving its
3 objections, Rome responds: No.

4 **Interrogatory No. 15**

5 As to each such asbestos-containing product listed in
6 defendant's preceding answers to interrogatories, did defendant
7 put on such products or their containers any warning of their
8 hazards to health by virtue of the asbestos content of such
9 products? If so, state for each such warning:

- 10 (a) Each such warning with particularity, with regard
11 to size, color, and location; whether the warning
12 was contained on the material or on the
13 container; whether the warning was printed,
14 stamped, and/or placed on a tag; and nature and
15 wording or other content. State whether you have
16 any photographs thereof;
17 (b) The inclusive date on which you began using each
18 such warning on each of your asbestos-containing
19 products; and
20 (c) All changes you made in such warnings and the
21 dates of such changes.

22 **Answer:**

23 See General Objections. Rome further objects to this
24 Interrogatory on the ground that it is argumentative insofar as
25 it improperly and incorrectly assumes that cable with
26 insulation containing encapsulated and saturated asbestos is
27 hazardous.

28 **Interrogatory No. 16**

As to any of the bags of raw asbestos fiber referred
to in defendant's preceding answers to interrogatories, did
defendant put on such bags any warning of the hazards to health
by virtue of the asbestos contained therein? If so, state for
each such warning:

- (a) Each such warning with particularity, with regard
to size, color, location, wording or other
content; whether the warning was contained on the
material or on the container; whether the warning
was printed, stamped, and/or placed on a tag
attached to the material or container;

- 1 (b) The inclusive dates each such warning was issued
2 on your bags of raw asbestos fiber;
3 (c) All changes you made in such warnings, the dates
4 of such changes, and the inclusive dates of such
5 changes; and
6 (d) The name, address and job title of each person
7 who presently has possession of samples or
8 documents relating to the above warnings.

9 Answer:

10 See General Objections. Without waiving its
11 objections, Rome responds: Not applicable.

12 Interrogatory No. 17

13 With respect to each of your asbestos-containing
14 products, state whether this defendant's name, a trademark,
15 logos, color coding, or other identifying markings ever
16 appeared on the actual product itself. If so, identify each
17 such product, state when the practice to place such identifying
18 markings upon the product was begun and when it ended, if
19 applicable, and describe in detail the pertinent marking(s) and
20 the purpose, if any, of such markings.

21 Answer:

22 See General Objections. This interrogatory requests
23 information concerning products manufactured during the period
24 1930 through 1985. Because the Interrogatory is not limited to
25 products allegedly used by plaintiff or plaintiff's decedent,
26 and plaintiff has not alleged exposure to any product
27 manufactured by Rome, the information sought is either
28 impossible to ascertain or so burdensome to produce as to
render the Interrogatory unjust, harassing, annoying and
oppressive. Without waiving its objections, Rome responds:
Rome will attempt to provide information for products
identified by plaintiff or plaintiff's decedent. Rome believes
that its products would have had features which identified Rome

1 as the manufacturer. Such features include marker tape
2 containing the company name, ink print or a legend with the
3 company name on the jacket, or blue and yellow marker threads.

4 **Interrogatory No. 18**

5 Identify all present or former executives, officers,
6 or other supervisory officials of defendant whose depositions
7 have been taken by plaintiffs, other than those herein, in
8 cases involving workers or their heirs who are suing this
9 defendant or have sued this defendant for illnesses or injuries
10 allegedly caused, in whole or in part, by exposure to asbestos
11 dust allegedly created by defendant's asbestos-containing
12 products and/or raw asbestos fibers. Identify the name of the
13 case, the court of filing, the court docket number, and the
14 date of the deposition.

15 **Answer:**

16 See General Objections. Without waiving its
17 objections, Rome responds: None.

18 **Interrogatory No. 19**

19 Between the years 1930 to 1985, did this defendant
20 purchase or otherwise acquire any asbestos-containing product
21 line from another company? If so, please state for each such
22 purchase:

- 23 (a) Date of contract of sale;
- 24 (b) Terms of purchase and sale agreement, or if you
25 will do so without a motion to produce, attach a
26 copy of said agreement(s) to your answers;
- 27 (c) Trade, brand, and/or generic name of each such
28 product line so acquired;
- (d) Name of company from whom you purchased each such
asbestos-containing product line; and
- (e) Location of any manufacturing facilities so
acquired, and the type of asbestos products
manufactured therein.

Answer:

See General Objections. Without waiving its
objections, Rome responds: No.

1 Interrogatory No. 20

2 Identify all brochures, pamphlets, catalogs or other
3 advertising relating to asbestos-containing products and/or raw
4 asbestos fibers which this defendant manufactured, sold,
distributed or supplied from the year 1930 to 1985. For each
such document please state:

- 5 (a) A description of the document;
- 6 (b) The year it was printed;
- 7 (c) The period of time in which it was used;
- 8 (d) The purpose of such documents;
- 9 (e) Whether the documents or copies of said document
presently exist;
- 10 (f) If said documents or copies still exist, where
they are located; and
- 11 (g) The name, job title, and current address of the
custodian of such documents.

12 Answer:

13 See General Objections. This interrogatory requests
14 information concerning products manufactured during the period
15 1930 through 1985. Because the Interrogatory is not limited to
16 products allegedly used by plaintiff or plaintiff's decedent,
17 and plaintiff has not alleged exposure to any product
18 manufactured by Rome, the information sought is either
19 impossible to ascertain or so burdensome to produce as to
20 render the Interrogatory unjust, harassing, annoying and
21 oppressive. Without waiving its objections, Rome responds:
22 Rome will attempt to provide information for products
identified by plaintiff or plaintiff's decedent.

23 Interrogatory No. 21

24 Were any of the raw asbestos fibers identified in
25 Interrogatory No. 9 sold, shipped or distributed to the General
26 Services Administration (GSA)? If so, specify the type of raw
27 asbestos fiber and state the period of time.
28

1 **Answer:**

2 See General Objections. Without waiving its
3 objections, Rome responds: Not applicable.

4 **Interrogatory No. 22**

5 Were any of the asbestos-containing products
6 identified in Interrogatory No. 10 sold, shipped or distributed
7 to General Services Administration (GSA)? If so, specify the
8 name of the asbestos-containing products and state the period
9 of time.

9 **Answer:**

10 See General Objections. Without waiving its
11 objections, Rome responds: Rome has no information or records
12 indicating any such sales.

13 **Interrogatory No. 23**

14 Please state if you formed within your corporate
15 structure an entity known as a "contract unit".

16 **Answer:**

17 See General Objections. Without waiving its
18 objections, Rome responds: No.

19 **Interrogatory No. 24**

20 Please state whether or not any of your "contract
21 units" were employed in the installation and/or removal of raw
22 asbestos fiber and/or asbestos-containing products at any time
23 in the defined geographic area for the years 1930 to 1985. If
24 so, please state:

- 24 (a) The inclusive periods of time the contract units
25 were working in the defined geographic area;
26 (b) The business addresses and names of the contract
27 units;
28 (c) Any records showing the locations of the jobsites
 where th contract units worked, and if so,
 describe them sufficiently to identify them for
 discovery purposes, and their present custodian;

- 1 (d) Did your contract units work in any shipyards,
2 refineries, power plants, utility companies,
3 breweries, or other jobsites in the defined
4 geographic area? If so, state the name of those
5 jobsites and the dates the contract units worked
6 at those jobsites;
7 (e) For each jobsite listed above, state the type and
8 nature of the work that was done.

9 Answer:

10 See General Objections. Without waiving its
11 objections, Rome responds: Not applicable.

12 Interrogatory No. 25

13 From 1930 to present, did you have insurance against
14 liability for the design, manufacture, distribution and sale of
15 asbestos-containing products?

16 Answer:

17 See General Objections. Without waiving its
18 objections, Rome responds: Yes.

19 Interrogatory No. 26

20 If your answer to the preceding interrogatory is in
21 the affirmative, please state:

- 22 (a) Name and address of each insurance company;
23 (b) Date and number of each policy;
24 (c) Limits of each policy, including the deductible;
25 and
26 (d) Name, address and company position of person who
27 has custody of each policy.

28 Answer:

See General Objections. Without waiving its
objections, Rome responds:

(a)-(c) pre - 1979 - unknown

CNA - 1979-1980

Commercial Union - 1980-1982

Liberty Mutual - 1982 - 1987

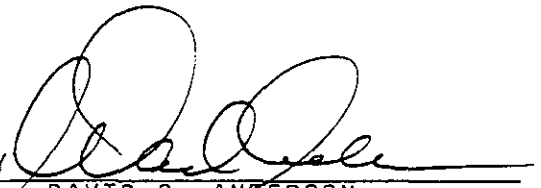
Travelers - 1987 - present

(d) Rock E. White, Treasurer,
c/o Rome Cable Corporation
421 Ridge Street,
Rome, New York

DATED: July 24, 1991

ROPERS, MAJESKI, KOHN,
BENTLEY, WAGNER & KANE

BY


DAVID C. ANDERSON

1
2
3
4
5
6
7 VERIFICATION
8
9

10 I am the Manager of Product Engineering of Rome Cable
11 Corporation. I have read the foregoing Responses to
12 Plaintiff's Standard Interrogatories and know the contents
13 thereof. No single official or employee of Rome Cable
14 Corporation has personal knowledge of all such matters. The
15 information contained herein has been compiled at my direction
16 by counsel for Rome Cable Corporation. I am informed and
17 believe all the responses are true and verify the responses on
18 that basis.

19 I declare under penalty of perjury, under the laws of
20 the State of California, that the foregoing is true and correct.

21 Executed this 22 day of July, 1991 at Rome, New
22 York.

23
24
25 Francis E. LaGase
26

27 Francis E. LaGase
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO:

I am a citizen of the United States. My business address is 670 Howard Street, San Francisco, California. I am employed in the County of San Francisco, where this mailing occurs. I am over the age of 18 years, and not a party to the within cause. On the date set forth below, I served the foregoing document(s) described as:

ROME CABLE CORPORATION'S RESPONSE TO PLAINTIFF'S STANDARD
INTERROGATORIES FOR SOLANO COUNTY AND FOR SAN FRANCISCO COUNTY
and ROME CABLE CORPORATION'S RESPONSE TO REQUEST FOR PRODUCTION
IN THE CASE OF Fontella Thomas v. Abex, et al.

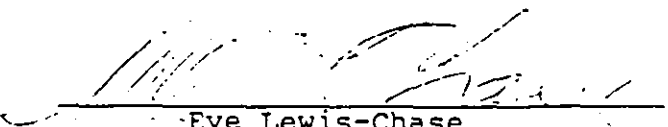
on the following person(s) in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Brayton & Associates Attorneys for Plaintiff
999 Grant Avenue
P.O. Box 2109
Novato, CA 94947

SEE ATTACHED LIST

- ☒ (BY MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at San Francisco, California.
- ☐ (BY FACSIMILE) I caused such documents to be transmitted by facsimile on this date to the offices of addressee(s).
- ☐ (BY PERSONAL SERVICE) I caused such envelope(s) to be delivered by hand this date to the offices of the addressee(s).
- ☒ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- ☐ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on July 24, 1991, at San Francisco, California.


Eve Lewis-Chase

MAILING LIST FOR ROME CABLE CORPORATION

Anchor Packing Company
McNamara, Houston, et al.
P.O. Box 5288
1211 Newall Avenue
Walnut Creek, CA 94596-1288
(415) 939-5330 (415) 939-0203

Dee Engineering Company
Walsworth, Franklin & Bevins
580 California St., Ste. 1335
San Francisco, CA 94104
(415) 781-7072 (415) 391-6258

Ericsson Radio Systems, Inc.
Jedeikin, Green, et al.
300 Montgomery St., Ste. 450
San Francisco, CA 94104
(415) 781-7050 (415) 421-5658

Fibreboard Corporation
Brobeck, Phleger & Harrison
One Market Plaza
Spear Street Tower
San Francisco, CA 94105
(415) 442-0900 (415) 422-1471

General Electric Company
Sedgwck, Detert, et al.
One Embarcadero Center
16th Floor
San Francisco, CA 94111
(415) 781-7900 (415) 781-2635

General Cable Corporation
Hancock, Rothert & Bunshoft
Four Embarcadero Center
10th Floor
San Francisco, CA 94111-4168
(415) 981-5550 (415) 955-2599

Gladding, McBean & Co.
c/o David Lucchetti, President
Agent for Service of Process
3001 I Street
Sacramento, CA 95816
(916) 444-9304

W.R. Grace & Company-Conn.
Clapp, Moroney, et al.
4400 Bohannon Dr.
Menlo Park, CA 94025
(415) 327-1300 (415) 327-3707

W.R. Grace & Company-Conn.
Gordon & Rees
Embarcadero Center West
275 Battery St., 20th Floor
San Francisco, CA 94111
(415) 986-8041 (415) 986-8054

Graybar Electric Company, Inc.
Capps, Staples, et al.
P.O. Box 5607
Walnut Creek, CA 94596
(415) 939-4411 (415) 939-5241

Keene Corporation
Morgenstein & Jubelirer
101 Market Street
6th Floor
San Francisco, CA 94105
(415) 896-0666 (415) 896-5592

Owens-Corning Fiberglas Corp.
Popelka, Allard, et al.
160 West Santa Clara Street
Suite 1300
San Jose, CA 95113
(408) 298-6610 (408) 275-0814

The Okonite Company, Inc.
Jackson, Wallace & Hayden
33 New Montgomery Street, #1840
San Francisco, CA 94105
(415) 974-6600 (415) 974-6770

Pittsburgh Corning Corporation
Hassard, Bonnington, et al.
50 Fremont St., Ste. 3400
San Francisco, CA 94105
(415) 543-6444 (415) 543-6401

DCAOPT.W50
07/24/91-ec

Pacific Coast Bldg. Products
c/o David Lucchetti, President
Agent for Service of Process
3001 I Street
Sacramento, CA 95816
(916) 444-9304

The Rockbestos Company
Bjork, Fleer, et al.
483 Ninth Street
Oakland, CA 94607
(415) 832-8134 (415) 832-0461

Waldron, Duffy, Inc.
Archer, McComas, et al.
P. O. Box 8035
2033 N. Main St., Suite 800
Walnut Creek, CA 94596

Simpson Paper Company
c/o Imai, Tadlock & Keeney
180 Montgomery Street #1000
San Francisco, CA 94104
(415) 989-8687

DCA00W.W50
07/24/91-ec