

JUN 27 2000 * 16

GERMER, BERNSSEN & GERTZ, L.L.P.

PLAINTIFF'S
EXHIBIT
ASI-35

ATTORNEYS AT LAW

805 PARK STREET
BEAUMONT, TEXAS 77701

(409) 838-2080 • FAX (409) 838-4050

E-MAIL: postmaster@germer.com • WEB PAGE: www.germer.com

JAMES R. OLD, JR.
PARTNER

e-mail: jroid@germer.com

June 23, 2000

Re: American Standard Responses to Plaintiffs' Master Discovery in Dallas County

Mr. Stephen Johnston
BARRON & BUDD
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Johnston:

I am writing in reference to your letter of May 31, 2000. As you know, Ben Dubose gave us some additional time to respond but I believe we are able to respond at this point in time with sufficient confidence that we have all of the information available to provide to you.

First, please note that we are filing discovery responses in the master asbestos file to correct the fact we had responded only in the *Murphy* case. Likewise, we have added some information in these responses specific to your requests including information regarding the designation of Mary Jane Mahoney as a custodian of records, the inadvertently omitted Exhibit "A" and a distributor list identified as Exhibit "B". We have also made reference to the three depositions previously produced in the *Murphy* case to Ben Dubose which have exhibits attached to them. My recollection is they filled a banker's box when it was all said and done.

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Mr. Stephen Johnston
June 23, 2000
Page 2

With respect to your request of a privilege log please be advised we have none to provide. Please see the revised responses to the request for production with regard to this issue.

With respect to your complaints regarding the substantive responses to discovery, the Exhibit "A" probably answers all of your concerns. If it does not, please call me. Otherwise please understand we have provided you virtually all of the information we have available to provide in response to these requests. I will be happy to work with you to try and resolve any concerns that you have but I would first appreciate your taking the time to review the very significant amount of information that has previously been produced in this matter and with respect to the *Murphy* case as well.

Finally, please contact the attorneys who are the lead counsel in the *Leroy Boehl* and *Malcolm Lee Murphy, Jr.* cases to discuss how you would like to proceed. I have tried to work with counsel directly in these cases to coordinate discovery issues. I have certainly expressed my concerns in the past over the vague discovery responses we have received from your firm but have also tried to give ample extensions so that complete responses can be prepared. If you are inclined to proceed with a motion to compel against American Standard I will have to proceed with similar motions against your clients in these cases, and therefore these attorneys would necessarily have to become involved as well.

Again, I welcome the opportunity to work with you to resolve any concerns you might have. Call me when you have time if you are in any respect unsatisfied with the information provided by way of this letter.

Yours truly,

GERMER, BERNSEN & GERTZ, L.L.P.



James R. Old, Jr.

JRO/tgm
Enclosure

Mr. Stephen Johnston
June 23, 2000
Page 3

cc: Mr. Ben K. DuBose (w/enclosure)
BARRON & BUDD
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

CERTIFIED MAIL
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cc: Ms. Melissa K. Hutts (w/enclosure)
BARON & BUDD, P. C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

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JAMES R. OLD, JR.
PARTNER

e-mail: jrold@germer.com

June 23, 2000

Re: All Asbestos Related Personal Injury or Death Cases Filed or to Be Filed in Dallas County,
Texas

Mr. Jim Hamlin
DALLAS COUNTY DISTRICT CLERK
George L. Allen Sr. Courts Bldg.
600 Commerce Street
Dallas, Texas 75202-4606

Dear Mr. Hamlin:

Enclosed please find an original and one copy of the following document which I would ask that you have filed in the proper records of the above referenced matter:

*** Defendant, American Standard Inc.'s Responses to Plaintiffs' Master Interrogatories and Requests for Production.**

I am also enclosing a self-addressed stamped envelope for your convenience in returning a file stamped copy of the above referenced document.

By copy of this letter, all known counsel of record are being provided a copy of same.

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Mr. Jim Hamlin
June 23, 2000
Page 2

Thank you in advance for your attention to this matter.

Yours truly,

GERMER & GERTZ, L.L.P.



James R. Old, Jr.

JRO/tgm
Enclosures

cc: Ms. Melissa K. Hutts
BARON & BUDD, P. C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

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cc: Mr. Ben DuBose
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Dallas, Texas 75219

CERTIFIED MAIL
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cc: Mr. Stephen Johnston
BARON & BUDD, P. C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, Texas 75219

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

IN RE:	§	
ALL ASBESTOS-RELATED	§	
PERSONAL INJURY OR	§	IN THE DISTRICT COURTS
DEATH CASES FILED OR TO	§	OF DALLAS COUNTY,
BE FILED IN DALLAS	§	TEXAS
COUNTY, TEXAS	§	

**DEFENDANT AMERICAN STANDARD INC.'S RESPONSES TO PLAINTIFFS'
MASTER INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Defendant American Standard Inc.'s ("American Standard," "ASI," or "this Defendant"),
for its Responses to Plaintiffs' Master Interrogatories and Requests for Production, states as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

This Defendant's Response to each of these Interrogatories incorporates this Preliminary
Statement and these General Objections.

The information used in responding to these Interrogatories was assembled by authorized
employees and counsel for this Defendant and was derived primarily from an ongoing review of
records and from ongoing discussions with this Defendant's past and present employees. Because
much of the information is of, or relates to, events of many years ago, it is difficult, if not impossible,
for this Defendant to retrieve or reconstruct some of the requested information. Many of the
individuals who might have had personal knowledge of the matters to which Plaintiffs' discovery
relate are deceased or are otherwise unavailable to Defendant, and investigations to date indicate that
at least some information and documents which might relate to matters inquired into by Plaintiffs'
discovery may have been destroyed pursuant to Defendant's normal record retention policy or are
otherwise unable to be found. Defendant is engaged in a continuing investigation in an attempt to
locate or confirm the absence of such information or documents and Defendant also is engaged in

a continuing investigation with respect to the matters inquired into by Plaintiffs' discovery. Therefore, this Defendant reserves the right to amend these Responses if new or more accurate information becomes available, or if errors are discovered. Furthermore, these Responses are given without prejudice to this Defendant's right to rely at trial on subsequently discovered information or on information inadvertently omitted from these Responses as a result of mistake, error or oversight. To the extent information contained herein differs in any material respect from any prior responses to discovery, this response shall be deemed to update and supersede such prior responses, to the extent they may be inconsistent.

Any objection by this Defendant to a request as being "overly broad" includes, but is not limited to, an objection to requests for information regarding the ultimate sale or distribution of products distributed or sold by this Defendant other than products identified by Plaintiffs as being at issue in this litigation, and which may not lead to the discovery of admissible evidence regarding products utilized at job sites where Plaintiffs are claiming exposure, because information sought regarding sales or distribution of other products of this Defendant is irrelevant and immaterial and not reasonably calculated to lead to the discovery of relevant, admissible evidence.

American Standard objects to these Master Interrogatories and Requests insofar as the information sought is not limited to a time frame relevant to Plaintiffs' claims or to activities which transpired in a geographical area to which the Plaintiffs would have had contact. This Defendant objects to those Interrogatories and Requests that request information and documents regarding the ultimate sale or distribution of products distributed or sold by this Defendant other than to jobsites where Plaintiffs worked and which may not lead to the discovery of admissible evidence regarding

product shipments that may have been utilized at jobsites where Plaintiffs are claiming exposure, because information sought regarding other sales or distribution of this Defendant's products is irrelevant and immaterial and not reasonably calculated to lead to the discovery of relevant, admissible evidence.

American Standard objects to the definition of the term "Defendant." American Standard has had numerous divisions, related entities and predecessors over the course of the decades referenced in Plaintiffs' Requests, many of which conducted business totally unrelated to the issues and claims raised in this litigation. On information and belief, Plaintiffs' claims against this Defendant relate to Defendant's former boiler products. Accordingly, American Standard will respond only on behalf of the entity to which process was directed and its former divisions and predecessors in interest which were involved in the manufacture of boilers.

It is difficult for ASI to respond to form Interrogatories such as these which are directed to the activities, organization and structure of companies engaged in the mining and/or manufacture of asbestos or asbestos-containing insulation products. It is not, nor has it ever been, a manufacturer of asbestos products or asbestos-containing insulation. As aforementioned, on information and belief, Plaintiffs' claims against ASI relate to boiler manufacture. As a result, these Interrogatory Responses apply only within that scope and context. To the extent that these Interrogatories call for information outside of that scope and context, this Defendant objects on the ground that such Interrogatories are overly broad, unduly burdensome, seek information neither relevant nor material to the subject matter of this case, and are not reasonably calculated to lead to the discovery of relevant, admissible evidence.

The Texas Rules of Civil Procedure limit interrogatories to twenty-five. This Defendant, by in good faith attempting to answer these sixty-four interrogatories - not including sub-parts - does not waive its objection that these interrogatories exceed the maximum number allowed.

Moreover, in responding to these Interrogatories, this Defendant does not concede the relevancy, materiality or admissibility of any information sought by the discovery Interrogatories or any responses thereto. These Responses are made subject to and without waiver of any questions or objections as to the competency, relevancy, materiality, privilege or admissibility of evidence, documents, or information referred to herein, or the subject matter thereof, in any proceeding, including trial.

Defendants further response to this discovery, you are referred to the various depositions of Mary Jane Mahoney and Debra Bedard, and attached exhibits, voluntarily produced by this Defendant to Mr. Ben Dubose of Barron & Budd in the *James Murphy* case on March 13, 2000 as well as all other documents voluntarily produced by ASI in that matter.¹

ANSWERS AND OBJECTIONS TO SPECIFIC INTERROGATORIES

Subject to and without waiving the foregoing, this Defendant responds to Plaintiffs' specific interrogatories as follows:

INTERROGATORY NO. 1:

State the name, address, job title, length of time employed by Defendant, and a year-by-year list of all other positions, titles, or jobs held when working for Defendant of each person who has supplied any information used in answering these interrogatories.

¹ The depositions are as follows: Mary Jane Mahoney (September 13, 1994) taken in *Robert L. Abernathy, et al v. AC&S, Inc.* Cause No. A-920,967-C in the District Court of Orange County, Texas; 128th Judicial District; Mary Jane Mahoney (May 27, 1999), taken in *Danny Harris, et al v. Asbestos Defendants*; No. 991114; in the Superior Court of the State of California in and for the County of San Francisco; and Deborah Bedard (September 11, 1996) taken in *Annie Ziemer, et al v Owens-Corning*, Cause No. 764451-5, in the Superior Court of the State of California, In and for the County of Alameda.

ANSWER TO INTERROGATORY NO. 1:

Defendant objects to this Interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. Subject to and without waiving such objections, see Preliminary Statement and General Objections. These Responses have been prepared with the assistance of its counsel.

INTERROGATORY NO. 2:

State whether or not you are a corporation. If so, state your correct corporate name, the state of your incorporation, the address of your principal place of business, the name and address of the person or entity authorized to accept service of process on your behalf, and whether or not you have ever held a Certificate of Authority to do business in the State of Texas.

ANSWER TO INTERROGATORY NO. 2:

Yes; American Standard Inc.; Delaware; One Centennial Avenue, Piscataway, New Jersey; American Standard Inc. was qualified to do business in the State of Texas on January 12, 1959. The agent for service of process is C T Corporation, 350 North Saint Paul Street, Dallas, Texas 75201.

INTERROGATORY NO. 3:

Has Defendant or any of its predecessor or subsidiary companies at any time engaged in the mining and subsequent sale of material containing asbestos fibers? If so, identify the location of the mine(s), the years of its operation, the type of asbestos mined and whether you sold any asbestos to any Defendants in the Dallas County asbestos litigation.

ANSWER TO INTERROGATORY NO. 3:

Defendant never mined, milled, purchased or sold raw asbestos, nor did it never manufacture asbestos insulation products.

INTERROGATORY NO. 4:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time manufactured or sold.

ANSWER TO INTERROGATORY NO. 4:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. It is not limited to a relevant time frame or jobsite or to products, if any, at issue in this litigation. Plaintiffs should limit their inquiry to the specific American Standard products, if any, to which they claim exposure.

Subject to and without waiving such objections, American Standard commenced with a merger in 1929 of American Radiator Company and the Standard Sanitary Manufacturing Company. In 1897, American Radiator bought the Ideal Boiler Company. In 1927, American Radiator bought Kewanee Boiler Co., which had been formed in 1898.

Following the merger in 1929, the company was known as the American Radiator & Standard Sanitary Corporation, until 1967 when it changed its name to American Standard Inc.

In 1952, Kewanee was merged into Kewanee-Ross Corporation, which was dissolved in 1955. Kewanee was thereafter operated as a part of various divisions of American Standard, until 1970, when the Kewanee Boiler assets were sold to Kewanee Boiler Corp., an unrelated entity. In 1974, American Standard sold its Hydronics Division, which had conducted American Standard's remaining boiler business.

Prior to 1975, American Standard, through its predecessors and divisions, engaged in the manufacture of relatively small boilers or pre-packaged boilers and burners for use in residential, commercial, institutional and industrial settings. American Standard has never engaged in the mining, milling, manufacture, sale or distribution of asbestos or asbestos fiber. It has never manufactured asbestos-containing insulation products. On occasion, prior to the late 1920s, but not thereafter, it may have offered, in unaltered condition, small quantities of asbestos cement and asbestos pipe covering manufactured by others as accessories to boiler sales. On occasion, prior to 1972, it may have offered, in unaltered condition, small quantities of rubberized asbestos-containing gaskets, rope and packing for replacement use in boilers.

Some boilers manufactured and sold by American Standard in some instances at some points in time, may have contained asbestos-containing components such as block, cement, gaskets, rope, air cell, board, tape, paper and/or packing manufactured by other companies such as Johns-Manville, Grant-Wilson, Palmer Asbestos & Rubber Company, Janos Asbestos Co., Eagle-Picher and Garlock. Other manufacturers may have supplied products as well. Such components were used by American Standard in its products in unaltered condition. Most of the above products were located beneath the boiler jacket. Commencing in the 1930s, metal jackets were utilized to insulate and enclose boilers. Also, fiberglass began to be used

in the place of asbestos in boilers in the 1940s. By the early 1950s, all boiler jackets manufactured by American Standard were insulated with fiberglass or mineral wool. After 1955, every American Standard boiler was jacketed. Kewanee boilers were jacketed beginning in 1960. American Standard and Kewanee boilers that were not jacketed, were not insulated at manufacture, but were shipped bare metal without insulation. By the 1970-72 time frame, Kewanee boilers no longer incorporated asbestos-containing gaskets and rope. American Standard does not have detailed information regarding all the products it may have sold, as there have been numerous mergers, acquisitions and dispositions over the years. However, Attachment A itemizes the American Standard boiler and heating products presently believed to have contained an asbestos-containing component in the past.

INTERROGATORY NO. 5:

Identify by name each product containing asbestos fibers that Defendant or any of its predecessor or subsidiary companies at any time marketed or sold.

ANSWER TO INTERROGATORY NO. 5:

See Objections and Response to Interrogatory No. 4.

INTERROGATORY NO. 6:

If the answer to one or more of the last three interrogatories is in the affirmative or lists any products, state as to each named product the following:

- A. As to each product, state whether such product was mined, manufactured, marketed, and/or sold.**
- B. The names of the companies mining, manufacturing, marketing, and/or selling each product mined, manufactured, marketed, and/or sold.**
- C. The trade or brand name of each of those products mined, manufactured, marketed and/or sold.**
- D. The date each of the named products was placed on the market.**
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product and the percentage of asbestos put in each product.**
- F. The date each of the products was removed from the market and no longer sold**

or distributed and the reason or reasons therefor.

- G. The date asbestos was removed from such products, if ever, and the reasons therefor.**
- H. A description of the physical appearance of each of the named products.**
- I. A detailed description of the intended uses of the named products.**
- J. Identify the last year that you sold each asbestos-containing product.**

RESPONSE TO INTERROGATORY NO. 6:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, seeks irrelevant information and is not reasonably calculated to lead to the discovery of relevant, admissible evidence. Subject to and without waiving such objections, see Objections and Response to Interrogatory No. 4. In addition, ASI respond as follows:

- A. See Objections and Response to Interrogatory No. 4.**
- B. See Objections and Response to Interrogatory No. 4.**
- C. American Standard, American Radiator, Ideal and Kewanee.**
- D. Except as provided in Response to Interrogatory No. 4, American Standard has no records of the dates such products were first placed on the market.**
- E. Any asbestos-containing components of ASI boilers were manufactured by others and incorporated into the boilers without material change. ASI exited the boiler business by 1974 and, as a result, has few documents and little information regarding such products. American Standard currently has no information as to the type, grade, or percentage of asbestos that these components may have contained, except, on information and belief, many, if not all, of such components contained chrysotile asbestos.**
- F. & G. See Objections and Response to Interrogatory No. 4. American Standard's Kewanee Boiler Division was sold in 1970. American Standard's Hydronics Division, which consisted of its remaining boiler business, was sold in 1974.**
- H. Generally, American Standard boilers were relatively small boilers for use in residential, commercial, institutional and industrial settings. American Standard boilers presently believed to have contained asbestos-containing components are**

identified on Attachment A and in response to Interrogatory No. 4.

- I. Generally, these relatively small boilers were used to generate heat, hot water and/or steam, depending on the year and model, and were fueled with coal, gas, oil or electricity. Temperature ranges and pressures varied with the model, size and application of the boiler. ASI did not manufacture boilers for ship propulsion.
- J. See Objections and Responses to Interrogatories Nos. 4 and 6(f).

INTERROGATORY NO. 7:

Do any documents, including but not limited to written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the design, preparation, or introduction into the market of the products listed in Interrogatory No. 6 still exist? If so, state:

- A. A description of each such document.**
- B. The name, address, and job title of each person who currently has possession of each document, and where the documents are currently located.**

ANSWER TO INTERROGATORY NO. 7:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to a product, if any, at issue in this litigation, a relevant time frame or jobsite. Subject to and without waiving such objections, Defendant states that it currently has limited brochures, catalogs and manuals relating to some models of its former boiler products during certain time frames. If Plaintiffs will identify the specific ASI boiler, if any, to which exposure is claimed, Defendant will determine what, if any, responsive documents exist. Regarding Interrogatory No. 7(b), Mary Jane Mahoney of ASI is the custodian of the limited existing boiler documents in question.

INTERROGATORY NO. 8:

Before distributing, selling, or placing the products listed in your responses to Interrogatory Nos. 3-6 into the streams of commerce, were any tests conducted to determine potential health hazards involved in the use of, or exposure to, the materials such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the date of each test.**

- B. The name, address, and job title of each person conducting the tests or involved with conducting the tests.**
- C. The results of the tests.**

ANSWER TO INTERROGATORY NO. 8:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, argumentative, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to a product, if any, at issue in this litigation. It is not even limited to alleged asbestos hazards. Subject to and without waiving such objections, inasmuch as ASI was not the manufacturer of any of the asbestos-containing components utilized in its boilers, but simply incorporated them "as is," without substantial change and because the asbestos-containing components utilized in Defendant's boilers were underneath a boiler jacket and/or otherwise encapsulated, no testing for asbestos emissions was believed necessary. Defendant was not and is not currently aware of any asbestos hazards posed by its former boiler products. On information and belief, Defendant's boiler products either did not release harmful levels of respirable asbestos fibers during installation or use or did not release respirable fibers in excess of limits established by OSHA and the EPA.

INTERROGATORY NO. 9:

Do any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the testing of the products referred to in Interrogatory No. 6 now exist? If so, state:

- A. A description of each such document.**
- B. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.**

ANSWER TO INTERROGATORY NO. 9:

See Objections and Response to Interrogatory No. 8.

INTERROGATORY NO. 10:

Did Defendant or any of its predecessor or subsidiary companies make any design changes or modifications as a result of those tests described in responses to Interrogatory No. 8? If the answer is affirmative, state:

- A. The trade names of the products changed.
- B. The nature of the changes made and the date of such changes or modifications.
- C. The name, address, and job title of each person responsible for having caused a change to be made, or having made a change or modification.

ANSWER TO INTERROGATORY NO. 10:

See Objections and Response to Interrogatory No. 8.

INTERROGATORY NO. 11:

After releasing the products listed in Interrogatory No. 6 to the public, were any tests conducted on them to determine potential health hazards resulting from the use of or exposure to the materials, such as asbestos, contained in those products? If the answer is affirmative, state:

- A. The names of the products tested and the dates of such tests.
- B. The name, address, and job title of each person who conducted those tests.
- C. The results of those tests.
- D. Whether, as a result of the tests, any products were removed from the market.
- E. The names of all products removed from the market as a result of these tests.

ANSWER TO INTERROGATORY NO. 11:

See Objections and Response to Interrogatory No. 8.

INTERROGATORY NO. 12:

Do any documents, including written memoranda, specifications, recommendations, blueprints, or other written materials of any kind or character, relating to the potential health hazards of the products listed in Interrogatory No. 6 now exist? If so, state:

- A. The name of each product.
- B. A description of each document and how it relates to each product.

- C. The name, address, and job title of each person who currently has possession of each document, and where it is presently located.

ANSWER TO INTERROGATORY NO. 12:

See Objections and Response to Interrogatory No. 8.

INTERROGATORY NO. 13:

Did Defendant or any of its subsidiary companies make any design changes as a result of the tests discussed in your response to Interrogatories No. 8 or 11? If the answer is affirmative, state:

- A. The names of the products changed or modified.
- B. The name, address, and job title of each person responsible for having made a change or modification.
- C. The nature of the hazard or defect which resulted in such change or modification.

ANSWER TO INTERROGATORY NO. 13:

See Objections and Response to Interrogatory No. 8.

INTERROGATORY NO. 14:

Has Defendant or any of its predecessor or subsidiary companies at any time published or distributed any printed material, including brochures, pamphlets, catalogs, packaging or other written material or any kind of character containing any warnings concerning the possibility of injury resulting from the use of the asbestos-containing products listed in Interrogatory No. 6? If so, state:

- A. The names of each relevant product.
- B. The exact wording of each warning statement on each printed material.
- C. A description of the printed material other than the warning statement.
- D. The method used to distribute the warning to persons likely to use the product.
- E. The date each warning was first issued, distributed, or placed on packaging.

- F. The name, address, and job title of each person responsible for having drafted or issued the warning.**
- G. The current location of any such printed material and the custodian thereof.**
- H. The form in which such literature or printed material can be accessed, i.e., the manner in which such literature is indexed or stored.**

ANSWER TO INTERROGATORY NO. 14:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, argumentative, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to a relevant time frame, product or job site. Subject to and without waiving such objection, American Standard did not manufacture any of the asbestos-containing component parts incorporated "as is," without substantial change, into its boiler products. Moreover, on information and belief, any asbestos-containing components utilized in its boilers/burners were located beneath the boiler jacket and/or otherwise encapsulated. On information and belief, no harmful levels of respirable asbestos fibers were released from ASI boilers and, as such, no warnings regarding asbestos were believed necessary.

INTERROGATORY NO. 15:

Before 1970, had you received notice that any individual or individuals, other than those Plaintiffs who have filed personal injury actions in Dallas County, Texas, is or are claiming or has or have claimed an injury as a result of using asbestos products manufactured and/or sold by your company or any of its predecessors or subsidiaries before 1970? If so, state:

- A. The name and address of each claimant.**
- B. The date of notice of each claim.**
- C. A description of the claim.**
- D. The type of injuries allegedly sustained.**
- E. The name and address of each attorney who represents each individual making a claim.**
- F. The style and court number of each claim.**

G. The disposition of each claim that has been settled or taken to judgment.

ANSWER TO INTERROGATORY NO. 15:

Defendant did not manufacture "asbestos products." Prior to 1970, American Standard received no notice of any claimed asbestos-related injuries alleged to have occurred as a result of using American Standard boilers.

INTERROGATORY NO. 16:

Were your asbestos products distributed, marketed, packaged, labeled and/or sold by companies other than your own? If the answer is affirmative, list the names and addresses of each of those companies, and the products in question.

ANSWER TO INTERROGATORY NO. 16:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to a relevant product, time frame and job site. Subject to and without waiving the foregoing objection, Defendant did not manufacture asbestos products. Defendant manufactured boilers and burners, some of which, at some points in time, may have contained asbestos-containing components. Some American Standard boiler products were sold through independent, wholesale distributors.

INTERROGATORY NO. 17:

Did you or any of your predecessors, successors, or subsidiaries have any distributors or sales representatives of asbestos products in the States of Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Texas and Virginia? If so, state:

- A. The name and address of each such distributor or sales representative.**
- B. The years in which such company or person distributed, marketed, or sold your products.**
- C. What products were distributed, marketed, or sold and in what years.**

ANSWER TO INTERROGATORY NO. 17:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to a relevant time frame, job site, geographic area and product. Subject to and without waiving such objections, Defendant's boiler products were sold by distributors in various jurisdictions. However, inasmuch as ASI exited the boiler business in 1974, the only information American Standard presently retains which identifies any distributors of its heating products in Alabama, Florida, Mississippi, Oregon, Washington, Georgia, Tennessee, Texas and Virginia is a June 1969 Official Distributor List for the U. S. Plumbing & Heating Division. A copy of that document is attached as Exhibit "B". However, the distributors on that list distributed various ASI products, such as plumbing supplies, most of which did not contain asbestos-containing components.

INTERROGATORY NO. 18:

List each employee (including only physicians and/or hygienists) who has acted in a medical advisory capacity to your company at any time during the past 40 years, including, but not limited to, physicians and industrial hygienists, and the current address, telephone number and job title of each of those individuals and who has, had or may have had any knowledge regarding the hazards of asbestos.

ANSWER TO INTERROGATORY NO. 18:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving such objections, American Standard presently is able to state only that Raymond Yerg was corporate medical director in 1981.

INTERROGATORY NO. 19:

Does Defendant have in its possession any books, pamphlets, memoranda, or written materials of any kind or character that would indicate that asbestos fibers, when inhaled, can be hazardous to the health of human beings? If so, state:

- A. The name of each such publication.**
- B. The date of publication and the names of the author and publisher (if any).**
- C. The name, job title, and address of each person who currently has possession of**

each publication and its present location.

ANSWER TO INTERROGATORY NO. 19:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is unlimited in time. Moreover, as written it seeks core work product. Subject to and without waiving such objections, Defendant is unaware of any responsive documents relating to boiler products.

INTERROGATORY NO. 20:

Has Defendant or any of its subsidiary or predecessor companies at any time been a member of any trade organization or association that published or disseminated any documents or information relating to the hazards of asbestos comprised of other manufacturers, miners, marketers, and/or sellers of asbestos products? If so, state:

- A. The name and address of each association or organization.**
- B. The dates during which Defendant or any of its subsidiaries or predecessors were members.**
- C. The names and dates of any publications, minutes, or reports published, written, or disseminated by any of the named associations or organizations.**
- D. Whether any of those publications are still in your possession, and if so:
 - 1. A description of the publications, including the date.**
 - 2. The current location of such publications.**
 - 3. The custodian of such publications.**
 - 4. The method or manner in which such publications are maintained.****

ANSWER TO INTERROGATORY NO. 20:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. Subject to and without waiving such objections, Defendant is a large, decentralized company that has had numerous employees in numerous divisions, over the course of a century. Defendant's employees may have held memberships in various organizations from time to time, but Defendant has no central repository for information of this type. As such, it is impossible for it to identify all organizations to which its employees may have belonged in the past, whether any of them received publications from

organizations and whether any publications that may have been received by individual employees still exist today.

At present it is able only to state that, on information and belief, Industrial Hygiene Foundation documents indicate that from 1936-1958, American Radiator and Standard Sanitary Corporation belonged to the Industrial Hygiene Foundation. From 1969-1971, American Standard was a member of this organization. From 1934 to a date unknown, Standard Sanitary Manufacturing Corporation was a member of the American Ceramic Society. American Standard rejoined this organization in 1981 and remains a member at present.

INTERROGATORY NO. 21:

Identify by name and location each plant or manufacturing facility in which the products listed in your answers to Interrogatory Nos. 3-6 were manufactured, assembled, or prepared for sale or marketing, specifying which plants produced each item, the dates each plant is or was in operation, and the time span during which each named item was produced or manufactured.

ANSWER TO INTERROGATORY NO. 21:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to a relevant product, time frame, job site and geographic area. Subject to and without waiving such objections, see Objections and Response to Interrogatory No. 4. Kewanee boilers were manufactured in Kewanee, Illinois. ASI boilers were manufactured in the U. S. at plants in various locations, primarily in Buffalo, New York and Detroit, Michigan.

INTERROGATORY NO. 22:

Have printed sales materials been prepared by Defendant or any of its subsidiary or predecessor companies or their agents for purposes of marketing or advertising products containing asbestos? If so, state:

- A. The name, address, and job title of each person or entity who prepared such materials.**
- B. The name, address, and job title of each person who currently has possession of such materials and their present location.**
- C. The date the materials were prepared.**

- D. The media used to disseminate the sales materials.**

ANSWER TO INTERROGATORY NO. 22:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to relevant time frames, products and job sites. Subject to and without waiving such objections, see Objections and Responses to Interrogatories Nos. 7 and 14.

INTERROGATORY NO. 23:

Have any written or printed materials or instructions of any kind or character been prepared by Defendant or any of its subsidiary or predecessor companies or their agents indicating how asbestos products should be used and maintained? If so, state:

- A. The name, address, and job title of each person who prepared such materials or instructions or assisted in their preparation.**
- B. The name, address and job title of each person who currently has possession of such materials or instructions and their present location.**
- C. The dates of distribution or use and the manner in which such materials or instructions were distributed to purchasers of Defendant's products or those of its subsidiaries or predecessors.**
- D. The year each such written material or instruction was prepared and disclosed to potential consumers.**

ANSWER TO INTERROGATORY NO. 23:

See Objections and Response to Interrogatory No. 22.

INTERROGATORY NO. 24:

Does Defendant have insurance policies that might cover the claims made by Plaintiffs in these cases? If so, list the name of each insurance carrier, the amount of initial coverage, amount of coverage remaining at the present time, and the effective dates of each policy. (If properly answered, this Interrogatory need not be supplemented as to the remaining amount of coverage).

ANSWER TO INTERROGATORY NO. 24:

Defendant object to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of relevant, admissible evidence. It repeats Plaintiffs' request for disclosure. Subject to and without waiving such objections, this Defendant claims to have liability insurance coverage, depending on the years of alleged exposure in question, for varying amounts from varying insurers. Insurance available to pay asbestos-related claims is aggregate and dependent upon the time and circumstances underlying each claim and the payments made under each policy. For some claims, no insurance may exist, depending on the date of exposure. American Standard is continuing to analyze the claims made against it and will supplement this response if it is able to accurately assess insurance coverage for those claims.

American Standard is presently able to state that it has had coverage provided to it at varying times from Michigan Mutual Insurance Company, Aetna Casualty, Travelers Indemnity Company, USF&G, Cigna and, perhaps, others. A chart of coverage is available for inspection and copying upon request.

INTERROGATORY NO. 25:

As to the disease asbestosis, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.**
- B. How Defendant became aware of the existence of the disease.**
- C. Who within the company first discovered, recognized or understood the adverse consequence or effects of the disease and/or of asbestos exposure.**
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.**
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.**
- F. Who is the custodian of such information.**
- G. The date on which you first received knowledge or information that asbestos was caused by inhalation of asbestos fibers.**

ANSWER TO INTERROGATORY NO. 25:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, irrelevant, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to the extent that it improperly calls for medical opinion. The interrogatory does not specify what level or type of exposure is claimed to be at issue. The Interrogatory fails to distinguish between fiber types and ignores important factors such as differences in the friability of asbestos fibers in different products, different uses of asbestos-containing products, different exposures of different individuals at different work sites engaged in different crafts and the frequency, proximity, regularity and duration of particular exposures. Subject to and without waiving such objections, Defendant is a corporation, which has employed numerous persons throughout the course of its business, any one of whom may have obtained varying degrees of knowledge regarding asbestos and asbestos-related disease at varying points in time. The amount of materials published in both the technical and popular press that discuss possible correlations between asbestos, especially friable, amphibole asbestos, and human health consequences is voluminous. Thus, Defendant is unable to definitively answer on what specific date, as a corporation, it first became aware of a possible correlation between asbestos, in particular circumstances, and certain human health consequences. At all relevant times, Defendant and its respective business divisions kept apprised of the prevailing industry standards and standards of medical art as they related to the operation of Defendant's respective businesses. Defendant presumably received notice of the hazards of asbestos at approximately the same time as did the general public, which is presently believed to have been in the 1970s. Defendant is not currently nor has it ever been aware of any clinical, epidemiological, toxicological, industrial hygiene, medical and/or scientific literature or study demonstrating that its products caused asbestos-related adverse health consequences. See also Response to Interrogatory No. 14.

INTERROGATORY NO. 26:

As to the disease lung cancer, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned that such disease was caused by inhalation of asbestos fibers by humans.**
- B. How Defendant or its subsidiary or predecessor became aware of the disease and its relationship to asbestos exposure.**
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.**
- D. What information was disseminated within Defendant's company or its**

subsidiary or predecessor regarding such adverse consequences or effects.

- E. Whether any such information is still maintained by Defendants or its subsidiaries or predecessors in a written form.**
- F. Who is the custodian of such information.**
- G. The date on which you first received knowledge or information that lung cancer was caused by inhalation of asbestos dust and fibers.**

ANSWER TO INTERROGATORY NO. 26:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, irrelevant, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to the extent that it improperly calls for medical opinion. The interrogatory does not specify what level or type of exposure is claimed to be at issue. The Interrogatory fails to distinguish between fiber types and ignores important factors such as differences in the friability of asbestos fibers in different products, different uses of asbestos-containing products, different exposures of different individuals at different work sites engaged in different crafts and the frequency, proximity, regularity and duration of particular exposures. Subject to and without waiving such objections, Defendant is a corporation, which has employed numerous persons throughout the course of its business, any one of whom may have obtained varying degrees of knowledge regarding asbestos and asbestos-related disease at varying points in time. The amount of materials published in both the technical and popular press that discuss possible correlations between asbestos, especially friable, amphibole asbestos, and human health consequences is voluminous. Thus, Defendant is unable to definitively answer on what specific date, as a corporation, it first became aware of a possible correlation between asbestos, in particular circumstances, and certain human health consequences. At all relevant times, Defendant and its respective business divisions kept apprised of the prevailing industry standards and standards of medical art as they related to the operation of Defendant's respective businesses. Defendant presumably received notice of the hazards of asbestos at approximately the same time as did the general public, which is presently believed to have been in the 1970s. Defendant is not currently nor has it ever been aware of any clinical, epidemiological, toxicological, industrial hygiene, medical and/or scientific literature or study demonstrating that its products caused asbestos-related adverse health consequences. See also Response to Interrogatory No. 14.

INTERROGATORY NO. 27:

As to pleural disease, pleural thickening or pleural plaques, state:

- A. The date on which Defendant or its subsidiary or predecessor learned such disease was caused by inhalation of asbestos fibers by humans.**
- B. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.**
- C. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.**
- D. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.**
- E. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.**
- F. Who is the custodian of such information.**

ANSWER TO INTERROGATORY NO. 27:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, irrelevant, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to the extent that it improperly calls for medical opinion. The interrogatory does not specify what level or type of exposure is claimed to be at issue. The Interrogatory fails to distinguish between fiber types and ignores important factors such as differences in the friability of asbestos fibers in different products, different uses of asbestos-containing products, different exposures of different individuals at different work sites engaged in different crafts and the frequency, proximity, regularity and duration of particular exposures. Subject to and without waiving such objections, Defendant is a corporation, which has employed numerous persons throughout the course of its business, any one of whom may have obtained varying degrees of knowledge regarding asbestos and asbestos-related disease at varying points in time. The amount of materials published in both the technical and popular press that discuss possible correlations between asbestos, especially friable, amphibole asbestos, and human health consequences is voluminous. Thus, Defendant is unable to definitively answer on what specific date, as a corporation, it first became aware of a possible correlation between asbestos, in particular circumstances, and certain human health consequences. At all relevant times, Defendant and its respective business divisions kept apprised of the prevailing industry standards and standards of medical art as they related to the operation of Defendant's respective businesses. Defendant presumably received notice of the hazards of asbestos at approximately the same time as did the general public, which is presently believed to have been in the 1970s. Defendant is not currently nor has it ever been aware of any clinical, epidemiological, toxicological, industrial hygiene, medical and/or scientific literature or

study demonstrating that its products caused asbestos-related adverse health consequences. See also Response to Interrogatory No. 14.

INTERROGATORY NO. 28:

As to the disease mesothelioma, state:

- A. The date on which Defendant or its subsidiary or predecessor first learned such disease was caused by inhalation of asbestos fibers by humans.**
- B. The date on which Defendant first suspected that mesothelioma was caused by inhalation of asbestos dust and fibers.**
- C. How Defendant or its subsidiary or predecessor became aware of the disease and that it was caused by exposure to asbestos.**
- D. Who within the company or its subsidiary or predecessor first discovered or recognized the adverse consequences or effects of asbestos exposure.**
- E. What information was disseminated within Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.**
- F. Whether any such information is still maintained by Defendants or its subsidiary or predecessor in a written form.**
- G. Who is the custodian of such information.**
- H. Whether Defendant agrees that there is no known medical cure for mesothelioma.**

ANSWER TO INTERROGATORY NO. 28:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, irrelevant, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to the extent that it improperly calls for medical opinion. The interrogatory does not specify what level or type of exposure is claimed to be at issue. The Interrogatory fails to distinguish between fiber types and ignores important factors such as differences in the friability of asbestos fibers in different products, different uses of asbestos-containing products, different exposures of different individuals at different work sites engaged in different crafts and the frequency, proximity, regularity and duration of particular exposures. Subject to and without waiving such objections, Defendant is a corporation, which has employed numerous persons

throughout the course of its business, any one of whom may have obtained varying degrees of knowledge regarding asbestos and asbestos-related disease at varying points in time. The amount of materials published in both the technical and popular press that discuss possible correlations between asbestos, especially friable, amphibole asbestos, and human health consequences is voluminous. Thus, Defendant is unable to definitively answer on what specific date, as a corporation, it first became aware of a possible correlation between asbestos, in particular circumstances, and certain human health consequences. At all relevant times, Defendant and its respective business divisions kept apprised of the prevailing industry standards and standards of medical art as they related to the operation of Defendant's respective businesses. Defendant presumably received notice of the hazards of asbestos at approximately the same time as did the general public, which is presently believed to have been in the 1970s. Defendant is not currently nor has it ever been aware of any clinical, epidemiological, toxicological, industrial hygiene, medical and/or scientific literature or study demonstrating that its products caused asbestos-related adverse health consequences. See also Response to Interrogatory No. 14.

INTERROGATORY NO. 29:

As to gastro-intestinal cancer, laryngeal cancer, pharyngeal cancer or lymphatic cancer, state:

- A. The type of cancer and the date on which Defendant or its subsidiary or predecessor first learned that such diseases were caused by inhalation of asbestos fibers by humans.**
- B. What cancers has the Defendant or its subsidiary or predecessor become aware can be caused by exposure to asbestos fibers?**
- C. The date on which Defendant first suspected other cancers were caused by asbestos inhalation.**
- D. Who within the company or its subsidiary or predecessor first discovered the adverse consequences or effects of asbestos exposure.**
- E. What information was disseminated with Defendant's company or its subsidiary or predecessor regarding such adverse consequences or effects.**
- F. Whether any such information is still maintained by Defendant or its subsidiary or predecessor in a written form.**
- G. Who is the custodian of such information.**

ANSWER TO INTERROGATORY NO. 29:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, argumentative, irrelevant, harassing and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects on the grounds that it assumes facts not in evidence and calls for medical opinion, which this Defendant is not qualified to render. Defendant would further state that, on information and belief, no association between the inhalation of asbestos fibers and cancer of the gastrointestinal tract, larynx, pharynx and/or lymph nodes has been established by the medical and/or scientific communities.

Subject to and without waiving such objections, Defendant is not currently nor has it ever been aware of any clinical, epidemiological, toxicological, industrial hygiene, medical and/or scientific literature or study demonstrating that its products caused asbestos-related adverse health consequences. The amount of materials published in the both the technical and popular press that discuss possible correlations between asbestos, especially friable, amphibole asbestos, and human health consequences is voluminous. Thus, Defendant is unable to definitively answer on what specific date it first became aware of a possible correlation between asbestos, in particular circumstances, and certain human health consequences. At all relevant times, Defendant and its respective business divisions kept apprised of the prevailing industry standards and standards of medical art as they related to the operation of Defendant's respective businesses.

INTERROGATORY NO. 30:

Does Defendant contend that asbestos products can be manufactured or designed so as to eliminate all potential health hazards to persons working with or exposed to them? If the answer is affirmative, explain in detail, and attach any studies or surveys on which this answer is based.

ANSWER TO INTERROGATORY NO. 30:

Defendant objects to this Interrogatory on the grounds that it is overly broad, vague, harassing, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. Subject to and without waiving such objections, Defendant did not manufacture the asbestos-containing components that it utilized "as is" in some of its boiler products. However, on information and belief, since such components were located under a boiler jacket or otherwise encapsulated, on information and belief, no harmful levels of respirable asbestos fibers were emitted. This issue will be the subject of expert testimony as set forth more fully in Defendant's expert witness designation.

INTERROGATORY NO. 31:

Describe in detail the types of packages or packaging which Defendant or any of its subsidiary or predecessor companies used for asbestos material or products, listing the dates each type of package was used, a physical description of each type of package, and providing a description of any printed material or trademarks that appeared thereon.

ANSWER TO INTERROGATORY NO. 31:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to relevant products, time frames or job sites. Subject to and without waiving such objections, if Plaintiffs will identify the specific American Standard boiler product to which they claim exposure, ASI will determine if responsive information is available.

INTERROGATORY NO. 32:

Has Defendant or any of its subsidiary or predecessor companies at any time entered into a "rebranding" agreement with any other company, either as buyer or seller, concerning asbestos materials or asbestos products? If so, state, as to each such agreement:

- A. The name of the company manufacturing the asbestos products.**
- B. The trade name affixed to those products.**
- C. The periods of time covered by each such agreement.**
- D. The volume, in dollar amount, of each transaction.**
- E. The initial purchaser of the products.**

ANSWER TO INTERROGATORY NO. 32:

No.

INTERROGATORY NO. 33:

List the name and address of each company from which Defendant or its subsidiary or

predecessor purchased materials or asbestos products which Defendant sold or distributed in any form, stating the form of the materials, the dates of such purchases, and the ultimate disposal of such materials.

ANSWER TO INTERROGATORY NO. 33:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. It is not limited to relevant time frames, products and job sites. Subject to and without waiving such objections, see Objections and Responses to Interrogatory No. 4.

INTERROGATORY NO. 34:

Does Defendant or any of its subsidiaries or predecessors currently have possession of any writings or contracts on those rebranding agreements set forth in the answer to Interrogatory No. 32? If the answer is affirmative, state:

- A. The name, address, and job title of each person having custody of each of those documents and their current location.
- B. A brief description of each such documents, including the dates and the parties signatory.

ANSWER TO INTERROGATORY NO. 34:

N/A.

INTERROGATORY NO. 35:

Prior to 1968, did any person file a claim against a Worker's Compensation carrier covering Defendant or any of its subsidiaries or predecessors alleging that he/she contracted a disease from inhaling asbestos fibers? If so, provide?

- A. A list of the claims, including each claimant's name, address and the date each claim was filed, and including the caption and jurisdiction of the claim.
- B. The disease alleged in each such claim.
- C. A brief summary of the disposition of each such claim.
- D. The name, address and title of the person having custody of the records pertaining to each such claim.

ANSWER TO INTERROGATORY NO. 35:

Defendant objects to this Interrogatory on the grounds that it is overly broad, vague, harassing, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. The conditions in Defendant's manufacturing plants, unrelated to its end products, are not relevant to Plaintiffs' claims in this litigation. Subject to and without waiving such objections, not to present knowledge.

INTERROGATORY NO. 36:

Did Defendant or any of its subsidiaries or predecessors maintain written minutes of corporate meetings, either board of directors, departmental, or otherwise, which reflect discussions pertaining to any subject matter related to asbestos products? If so, for each such set of minutes, state:

- A. The dates of each such meeting.**
- B. The general subject matter discussed at each meeting.**
- C. Who was in attendance at each meeting.**
- D. Where and by whom the written minutes are presently maintained.**
- E. By whom the minutes were taken and put into final format.**
- F. Whether the minutes were abstracted and reports disseminated to other individuals, and if so, the names and job titles of those individuals.**

ANSWER TO INTERROGATORY NO. 36:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of relevant, admissible evidence. Moreover, the Request seeks information and documents protected by the work product, attorney/client and/or other privilege. It is not limited to relevant boiler products. Subject to and without waiving such objections, not to present knowledge.

INTERROGATORY NO. 37:

Do you or any of your subsidiaries, including foreign business entities, currently manufacture any products containing asbestos? If so, state:

- A. As to each product, whether such product is mined, manufactured, and/or marketed or sold.
- B. The names and addresses of the companies mining, manufacturing, marketing, and/or selling each of those products.
- C. The trade or brand name of each of those products mined, manufactured, marketed, and/or sold.
- D. The date each of the named products was placed on the market.
- E. A description of the physical (chemical) composition of each of the named products, including the type of asbestos contained in the product.
- F. A description of the physical appearance of each product and its packaging.
- G. A detailed description of the intended uses of each of the named products.
- H. Whether there are any warning labels on said products or containers regarding potential asbestos-related health hazards.

ANSWER TO INTERROGATORY NO. 37:

No.

INTERROGATORY NO. 38:

State whether you or any of your predecessors and/or subsidiaries maintain, from 1940 through the present or for any portion thereof, copies of invoices, shipping documents, bills of lading, purchase orders, or other documents of a similar nature relating to the mining, manufacture, marketing, sale or distribution of asbestos products. If so, state:

- A. The location of such documents.
- B. The name and address of the custodian of the documents.
- C. The format in which the documents are kept, i.e., hard copy, microfilm, microfiche, etc.
- D. In what form the documents can be accessed, i.e., by state, by product, etc., and if by product, whether kept according to asbestos or non-asbestos.

ANSWER TO INTERROGATORY NO. 38:

Defendant objects to this Interrogatory on the grounds that it is overly broad, vague, harassing, argumentative, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. It is not limited to relevant products and time frames. Subject to and without waiving such objections, no such documents are known to exist regarding ASI's former boiler products.

INTERROGATORY NO. 39:

**May you call company representatives as witnesses at the trial of any of these cases?
If so, list:**

- A. The name, address, and job title of each company representative who may be called.**
- B. A summary of the testimony expected to be given by each such witness.**
- C. List any and all previous times that the named witnesses have either given deposition or trial testimony in an asbestos-related case, including the jurisdiction, style of the case, case number, date of testimony, and the name of the attorney taking the deposition for the Plaintiffs in that case.**

ANSWER TO INTERROGATORY NO. 39:

Defendant has not yet made a determination of who it will call at a trial of this action. ASI will provide its witness lists in accordance with the scheduling orders of the Court and the Rules of Civil Procedure.

INTERROGATORY NO. 40:

Have Defendant or its subsidiaries or predecessors ever acquired through purchase, reorganization, or merger another corporation, company, or business which manufactured, sold, processed, distributed, or contracted or supplied products containing asbestos? If so, for each such entity, state:

- A. Full and correct name;**
- B. Principal place of business;**
- C. State of incorporation;**

D. Date of acquisition by Defendant;

E. Whether or not the business entity was ever authorized to transact business in the State of Texas;

ANSWER TO INTERROGATORY NO. 40:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. It is not limited to relevant products and time frames. Subject to and without waiving such objections, see Objections and Response to Interrogatory No. 4.

INTERROGATORY NO. 41:

Was each of your asbestos products generally expected to reach, or packaged to reach, the consumer or user, without substantial change in the condition in which it was sold? If not, with respect to any such product, explain in what way the Defendant claims its products were altered or substantially changed after sale or distribution and before reaching the user.

ANSWER TO INTERROGATORY NO. 41:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of relevant, admissible evidence. It is not limited to relevant products and time frames. Subject to and without waiving such objections, if Plaintiffs will identify the specific ASI boiler product allegedly at issue, Defendant will determine if further response may be made.

INTERROGATORY NO. 42:

For each asbestos-containing product identified in response to Interrogatory No. 6, identify all foreseeable users such as insulators, helpers, pipefitters, welders, machinist, plasterers, drywall finishers, carpenters, boilermakers, shipwrights and riggers, etc. of any of Defendants's asbestos-containing products.

ANSWER TO INTERROGATORY NO. 42:

Defendant objects to this Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant, admissible evidence. It is not limited to products at issue in this litigation, if any, or to a relevant time frame or job site. Subject to and without waiving such objections, Defendant did not manufacture or sell asbestos-containing insulation products. ASI's boilers were

usually installed by plumbers or mechanical contractors involved in boiler installation.

INTERROGATORY NO. 43:

Based upon the material contents of your asbestos-containing products, the method of manufacturing, and the method of application, can such products be generally applied without liberating asbestos fibers into the air?

- A. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company, then specify the different products by precise manufacturer's name and popular name.**
- B. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and year involved.**

ANSWER TO INTERROGATORY NO. 43:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to a relevant product, job site and time frame. Subject to and without waiving such objections, Defendant states it did not manufacture asbestos products. Defendant's boiler products are not "applied". See also response to Interrogatory No. 14.

INTERROGATORY NO. 44:

Was it a foreseeable use of your asbestos-containing products that they may have been removed, stripped, or replaced at some time after installation?

ANSWER TO INTERROGATORY NO. 44:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to a relevant product, job site and time frame. Subject to and without waiving such objections, Defendant states that its boiler products and various components thereof, may need replacement at some point in time, under certain circumstances.

INTERROGATORY NO. 45:

Before 1970, did you or your subsidiaries or predecessor(s) ever arrange for any labor inspectors, insurance company inspectors or anyone from your company to go to job sites where your products were being used or installed to make or take dust level counts? If so, state when this procedure started, the purpose of such procedures, and all results of such procedures.

ANSWER TO INTERROGATORY NO. 45:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, argumentative, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to relevant products, job sites and time frames. The conditions of ASI plants or of jobsites where Plaintiff did not work are not relevant to Plaintiffs claims in this litigation. Subject to and without waiving such objections, any asbestos-containing components installed into American Standard products were manufactured by others and purchased and installed into its products, primarily under the boiler jacket, without substantial change. As such, there was no reason to believe that any significant threat to health was presented thereby. Moreover, American Standard typically sold its boilers to distributors and, as such, the identity of the purchaser was not always known to ASI. Defendant is presently unaware of any labor inspectors, insurance company inspectors or anyone else performing dust level counts at the job sites of any end-users of ASI boilers.

INTERROGATORY NO. 46:

If Defendant performed or had performed any dust level counts, what action, based on the results, did your company take?

ANSWER TO INTERROGATORY NO. 46:

See Objection and Response to Interrogatory No. 45.

INTERROGATORY NO. 47:

Has your company or its subsidiaries or predecessor(s) ever conducted or caused to be conducted any studies designed to assist in minimizing or eliminating the inhalation of asbestos dust and fibers by those exposed to the use of your company's products? If so, give the following:

- A. Name of the person or firm conducting such studies;**
- B. The date the studies began and the date they were completed;**

- C. Any publication or other written dissemination of the results of the studies;
- D. The nature of any action to eliminate or minimize the inhalation of asbestos dust fibers;

ANSWER TO INTERROGATORY NO. 47:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, argumentative, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to relevant products, job sites and time frames. Subject to and without waiving such objections, no. On information and belief, no harmful levels of respirable asbestos fibers were emitted from ASI boiler products. See Objections and Response to Interrogatory No. 14.

INTERROGATORY NO. 48:

Does your company have, has it ever had, or have your predecessor(s) or subsidiaries ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established. State also:

- A. The amount of time and money expended each year on research concerning asbestos or asbestos-containing products?
- B. What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health effects of asbestos?
- C. State in detail the purposes, duties, and responsibilities of such Research Department.

ANSWER TO INTERROGATORY NO. 48:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving such objections, not to present knowledge.

INTERROGATORY NO. 49:

Does your company have, has it ever had, or have your predecessor(s) or subsidiaries ever had, a Medical Department? If so, state:

- A. The year such Medical Department was established;**
- B. Whether or not such Medical Department has operated continuously since being established;**
- C. The name of each director, chief, or head of your Medical Department year by year, beginning with the first year you had a Medical Director or Medical Department, and the last known address and phone number of each;**
- D. State the duties and responsibilities of such Medical Department.**

ANSWER TO INTERROGATORY NO. 49:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving such objections, while Defendant did not have a medical department, it is currently known only that Raymond Yerg was the medical director in 1981.

INTERROGATORY NO. 50:

Did your company or its predecessor(s) or subsidiaries ever place any warning directly on any of its asbestos-containing produce or on their packaging. If so, identify the product(s) and year said warning was first applied.

ANSWER TO INTERROGATORY NO. 50:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, duplicative, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. See also response to Interrogatory No. 14.

INTERROGATORY NO. 51:

Did your company or its predecessor(s) or subsidiaries ever stamp or place the name of the company, its initials, or any identifying logo on any of its asbestos-containing products? If so, please state the name brand names of such products, a description of such stamp or logo and the dates such were placed on the referred products.

ANSWER TO INTERROGATORY NO. 51:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly

burdensome and not reasonably calculated to lead to the discovery of relevant and admissible evidence. It is not limited to a relevant product or time frame. Subject to and without waiving such objections, American Standard's name was placed on each boiler. Older boilers may say "American Radiator" and/or "Ideal". The Kewanee name appeared on each boiler from that former subsidiary.

INTERROGATORY NO. 52:

Has your company, or your predecessor(s) or subsidiaries, ever devised a research plan to develop, or actually developed or had developed, a product which did not contain asbestos and which could be substituted for one or more of your asbestos-containing products? If so, state the date that such research plan was begun and when such asbestos-free product was first placed on the market.

ANSWER TO INTERROGATORY NO. 52:

Defendant objects to this Interrogatory on the grounds that it is argumentative, assumes facts not in evidence, it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to relevant products and time frames. Subject to and without waiving such objections, Defendant did not develop or manufacture asbestos products. It did not develop or manufacture insulation products. In some cases, Defendant's boilers contained asbestos-containing components which were manufactured by others and incorporated into the boilers without material change. Commencing in the 1930s, medical jackets were utilized to insulate and enclose boilers. Fiberglass began to be used in the place of asbestos in boilers in the 1940s. By the early 1950s, American Standard believes all boiler jackets insulated by it were insulated by fiberglass and mineral wool. By the 1970-72 time frame, many boilers no longer incorporated asbestos-containing gaskets, rope or packing. On information and belief, asbestos was removed from block and cement, by their manufacturers, by 1972. American Standard sold the Kewanee boiler assets to Kewanee Boiler Corp., an unrelated entity. In 1974, American Standard sold its hydronics division, which had conducted its remaining boiling business.

INTERROGATORY NO. 53:

Did your company or its predecessor(s) or subsidiaries ever recall any products containing asbestos from the market or stream of commerce? If so, state:

- A. All details of such recall;**
- B. The name of the product recalled, including the reason for the recall and the names and current addresses of those individuals who determined that it should**

take place;

C. The dates of recall;

D. The purpose for the recall.

ANSWER TO INTERROGATORY NO. 53:

Defendant objects to this Interrogatory on the grounds that it is argumentative, overly broad, unduly burdensome, seeks irrelevant information and is not reasonably calculated to lead to the discovery of relevant admissible evidence. It is not limited to products at issue in this litigation, if any, or to a relevant time frame. Subject to and without waiving such objections, not to present knowledge.

INTERROGATORY NO. 54:

Before 1970, did you ever manufacture or sell products which did not contain asbestos and which could be substituted for your asbestos-containing products? If so, state the date such asbestos-free products were first placed on the market.

ANSWER TO INTERROGATORY NO. 54:

Defendant objects to this Interrogatory on the grounds that it is argumentative, overly broad, unduly burdensome, seeks irrelevant information and is not reasonable calculated to lead to the discovery of relevant admissible evidence. It is not limited to products at issue in this litigation, if any or to a relevant time frame. Subject to and without waiving such objections, see Objections and Responses to Interrogatory No. 52.

INTERROGATORY NO. 55:

Have any products you identified in your response to Interrogatory Nos. 52 and 54 not performed as intended? Please list all such products that have not performed as intended.

ANSWER TO INTERROGATORY NO. 55:

Defendant objects to this Interrogatory on the grounds that it is vague, overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of relevant admissible evidence. It is not limited to products at issue in this litigation, if any, or to a relevant time frame. Subject to and without waiving such objections, not to present knowledge.

INTERROGATORY NO. 56:

Did your company or its predecessor(s) or subsidiaries ever make, order, or arrange for any industrial hygiene surveys regarding asbestos or asbestos-containing dust? If so, give the date of such surveys and state who, or what entity, was responsible for completion of such surveys.

ANSWER TO INTERROGATORY NO. 56:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of relevant admissible evidence. It is not limited to products at issue in this case and is unlimited in time. The conditions of ASI plants are not relevant to Plaintiffs claims in this litigation. Moreover, conditions in Defendant's plants, unrelated to its end products, are also not relevant to this litigation. See also Objection and Response to Interrogatory No. 45

INTERROGATORY NO. 57:

As to either the threshold limit values or maximum allowable concentrations of both asbestos dust and total dust provided by the American Conference of Governmental Industrial Hygienists, state:

- A. The year in which Defendant or any predecessor(s) or subsidiaries were first advised of such limits or concentrations;**
- B. The name of the employee or official of the company receiving such advice;**
- C. How Defendant received notice of such limits or concentrations.**

ANSWER TO INTERROGATORY NO. 57:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving such objections, American Standard, as a corporation, gains knowledge only through its agents. It has employed numerous persons over the years and when one of them may have first learned of such information is unknown. When American Standard, a corporate entity, first obtained knowledge of such values and concentrations cannot be determined.

INTERROGATORY NO. 58:

Were the threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 57 for total dust, and not asbestos dust alone?

ANSWER TO INTERROGATORY NO. 58:

See objections and response to Interrogatory No. 57.

INTERROGATORY NO. 59:

State in detail what tests, if any, Defendant ever made with regard to the quantity, quality or threshold limit values of asbestos dust or particles to which workers were exposed while using, working with or around, or installing your asbestos-containing products.

ANSWER TO INTERROGATORY NO. 59:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. It is not limited to products at issue in this case, the manner of alleged exposure(s) involved, the types of products producing the source of alleged exposure, nor is it limited in time. Subject to and without waiving such objections, see Objections and Responses to Interrogatory No. 8.

INTERROGATORY NO. 60:

Please state the following with respect to each expert witness you that you may call during trial of these cases. Please designate with specificity the expert witnesses that you will call, including:

- (a) The name, address, and job classification of each such expert witness;**
- (b) The subject matter on which the expert is expected to testify;**
- (c) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;**
- (d) Whether any person identified in subparagraph (a) above has provided a report or other documentation to you, and if so, identify each such document or report;**
- (e) Identify all documents that you have provided to each person identified in**

- response to subparagraph (a) above;
- (f) Describe in detail the education and work history of, and identify any books, treatises, articles, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to subparagraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answers.

ANSWER TO INTERROGATORY NO. 60:

Objection. This request duplicated the Plaintiffs' request for disclosure and is thus an improper request. Subject to and without waiving the foregoing, see Defendant's responses to Plaintiffs' Request for Disclosure. Defendant will file its expert witness designation in accordance with the scheduling orders of the court and the Rules of Civil Procedure.

INTERROGATORY NO. 61:

Please state the name, present address and present telephone number, along with the experience and qualifications, if applicable, of each and every person, known to Defendant or to Defendant's agents, having knowledge of facts relevant to these cases involving, but not limited to:

- (a) identification of asbestos-containing products to which each and every individual Plaintiff, separate and distinct from all other Plaintiffs within the group, allegedly was exposed or facts disputing the identification of asbestos-containing products in this case.
- (b) Each and every individual Plaintiff's separate and distinct from all other Plaintiffs within the group, alleged damages, injuries and/or facts disputing each and every Plaintiff's alleged damages and/or injuries;
- (c) the negligence of any person or entity other than Defendant which Defendant contends was a cause of each and every individual Plaintiff's, separate and distinct from all other Plaintiffs within the group, alleged injuries and/or damages;
- (d) each of Defendant's defenses enumerated in Defendant's last filed Answer in each of these cases.

ANSWER TO INTERROGATORY NO. 61:

Defendant objects to this Interrogatory on the grounds that it is vague, overly broad and unduly burdensome. It is impossible to answer when Plaintiffs have not identified the products to which they were allegedly exposed. Subject to and without waiving such objections, discovery is continuing. Defendant will supplement in accordance with the Texas Rules of Civil Procedure. See Defendant's lay and expert witness designations.

INTERROGATORY NO. 62:

Please identify documents which will be used at time of trial, (Exhibit List, Deposition List), which are relevant to each of Defendant's enumerated defenses in Defendant's last filed Answer.

ANSWER TO INTERROGATORY NO. 62:

Defendant has not yet determined which documents will be used at a trial of this matter. Defendant will file its exhibit and designation lists in accordance with the scheduling orders of the Court and the Rules of Civil Procedure.

INTERROGATORY NO. 63:

When, if ever, did Defendant or any of its predecessor-in-interest first receive a copy of the article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels", published in January, 1846 in the Journal of Industrial Hygiene & Toxicology, and authored by W. Fleischer and P. Drinker, et al ("the Fleischer-Drinker Report")?

- a. **Identify the name and position of the employee or officer who received same;**
- b. **please produce all documents generated by Defendant which discuss or in any way reference the "Fleischer-Drinker" study prior to 1968;**
- c. **please produce all documents upon which your responses above are based;**
- d. **please identify the name(s) and address(es) of any persons(s) who can verify your above responses;**
- e. **did Defendant ever rely on the Fleischer-Drinker Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;**
- f. **if so, please produce every document which evidences in any way that**

Defendant relied on the Fleischer-Drinker Report in whole or in part for the proposition stated in Interrogatory No. 63(a) above;

- g. if your answer to 63(e) is yes, when was the first date Defendant relied on the Fleischer-Drinker report in whole or in part for the proposition stated in 63(e) above?**

ANSWER TO INTERROGATORY NO. 63:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving such objections, American Standard has employed numerous persons over the course of the last century. It is unknown whether or when any employee might have received or reviewed the Fleischer-Drinker Report. This Defendant is aware of no corporate documents that discuss it.

INTERROGATORY NO. 64:

When, if ever, did Defendant or any of its predecessors-in-interest first receive a copy of the article entitled "A Study of Asbestos in the Asbestos Textile Industry", published in 1938 in Public Health Bill, No. 241, U. S. Public Health Service and authored by W. C. Dreessen ("the Dreessen Report")?

- a. Identify the name and position of the employee or officer who received same;**
- b. please produce all documents generated by Defendant which discuss or in any way reference the "Dreessen" study prior to 1968;**
- c. please produce all documents upon which your responses above are based;**
- d. please identify the name(s) and address(es) of any person(s) who can verify your above responses;**
- e. did Defendant ever rely on the Dreessen Report in whole or in part as a basis that Defendant's asbestos products could be used in the workplace without risk of asbestos-related health impacts to the consumer and/or bystander;**
- f. if so, please produce every document which evidences in any way that Defendant relied on the Dreessen Report in whole or in part for the proposition stated in Interrogatory 63(a) above;**
- g. if your answer to 63(e) is yes, when was the first date Defendant relied on the**

Dreessen Report in whole or in part for the proposition stated in 63(e) above:

ANSWER TO INTERROGATORY NO. 64:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, harassing, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. American Standard has employed numerous persons over the course of the last century. It is unknown whether or when any employee might have received or reviewed the Dreessen Report. This Defendant is aware of no corporate documents that discuss it.

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a true and correct copy of each photograph of each asbestos-containing product identified in answer to Interrogatory No. 4.

RESPONSE:

Defendant objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, harassing, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiffs have not identified any specific American Standard asbestos containing boiler product to which they were allegedly exposed. Subject to and without waiving such objections, if Plaintiffs will specifically identify the boilers, if any, to which they claim exposure, Defendant will determine whether any responsive documents exist, by way of catalogs, brochures or manuals and will make same available for copying and inspection by plaintiffs' counsel at a mutually convenient time and date.

REQUEST FOR PRODUCTION NO. 2:

Please produce any diagrams or schematics indicating, stating or detailing the existence of any of your subsidiaries, predecessors, or divisions as defined on Page 1 of these Interrogatories and Request for Production.

RESPONSE:

Defendant objects to this Request for Production on the grounds that it is overly broad, unduly burdensome, harassing, vague, ambiguous, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing, no known non-privileged documents are believed to exist. All privileged documents are core work product.

Dated this the ____ day of June, 2000.

Respectfully submitted,

GERMER, BERNSSEN & GERTZ, L.L.P.

BY: 

JAMES R. OLD, JR.

STATE BAR NO.: 15242500

805 PARK STREET

BEAUMONT, TEXAS 77701

TELEPHONE: (409) 838-2080

TELECOPIER: (409) 838-4050

ATTORNEY FOR DEFENDANT
AMERICAN STANDARD INC.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Defendant, American Standard, Inc.'s Answers to Plaintiffs' Master Set of Interrogatories and Request for Production, has been served by Certified Mail, Return Receipt Requested, postage pre-paid and properly addressed on Plaintiff's counsel of record on this 23rd day of June, 2000:

Mr. Ben K. Dubose
BARON & BUDD,
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

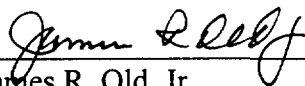
CM/RRR

Mr. Stephen Johnston
BARON & BUDD,
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

CM/RRR

Ms. Melissa Hutts
BARON & BUDD,
The Centrum, Suite 1100
3102 Oak Lawn Avenue
Dallas, Texas 75219

CM/RRR



James R. Old, Jr.

VERIFICATION

STATE OF NEW JERSEY

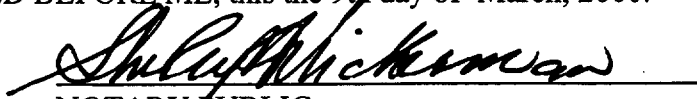
COUNTY OF MIDDLESEX

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the jurisdiction aforesaid, the within named William R. Hedden, who, having been first by me duly sworn, stated on his oath that he signed the above and foregoing Responses to Plaintiffs' Master Interrogatories and Requests for Production for and on behalf of American Standard Inc., sued as American Standard Inc., and that he is duly authorized so to do; that the matters stated in the above and foregoing Responses are not solely within his personal knowledge, but that he is informed that there is no single officer of American Standard Inc. who has personal knowledge of all such matters; that the facts stated in said Response have been assembled by various employees, agents, representatives and counsel; and that he is informed and believes that the facts set forth in said Response are true and correct as herein stated.



WILLIAM R. HEDDEN
CORPORATE COUNSEL

SWORN TO AND SUBSCRIBED BEFORE ME, this the 9th day of March, 2000.


NOTARY PUBLIC

My Commission Expires:

SHIRLEY A. VICKERMAN, NOTARY PUBLIC
State of New Jersey, No. 2169153
Qualified in Essex County
Commission Expires 03-25-2001

ATTACHMENT "A"

Information Sheet Regarding American Standard Heating Products Containing Asbestos Components

Please note that only those furnaces, winter air conditioners, boilers/burners as to which there is current verifiable information of an asbestos component at one time are included in this list.

1. A-3, A-5 and FR-A-3 OIL FIRED BOILERS

Manufactured from approximately 1963-1973.

Burner Pressure Plate insulation was composed of wire woven asbestos cloth. The hanger-mount in the burner contained asbestos tape. It is believed that the tape was supplied by Johns-Manville. May have also contained asbestos gaskets.

2. A-7 OIL/STOKER/HAND-FIRED BOILERS

Manufactured from approximately 1955-1973

The combustion chamber base was composed of 1" asbestos board.
May have also contained asbestos gaskets.

3. APH OIL BOILER, WATER ONLY SERIES 1B

Manufactured from approximately 1963-1965.

The combustion chamber (retainer) contained 1/4" asbestos air cell corrugated paper with aluminum foil on flat side. The paper was purchased from Grant Wilson, Inc., Chicago, Illinois. May have also contained asbestos gaskets.

4. ARCOLINER OIL-FIRED WET BASE BOILER

Manufactured from approximately 1946-1950.

A layer of air cell asbestos insulation was placed beneath the flush metal jacket of the boiler.

5. EMPIRE GAS BOILER

Manufactured from approximately 1928-1950.

Jacket insulated with aircell asbestos insulation.

6. SUNBEAM ARLINGTON, CLIFFDALE AND ALLERTON FURNACES

Contained asbestos gaskets and asbestos rope on burner mount. Coal hand fired Arlington steel pipeless furnace (but not Arlington steel pipe or Arlington square steel pipe furnaces) also contained asbestos cement

7. SUNBEAM KENWOOD FURNACE

Contained asbestos paper and cement.

8. G-2 GAS BOILER

Manufactured from approximately 1957-1974.

The boiler jacket canopy was sealed with 1/4" asbestos wick packing, which was purchased from Johns-Manville or Janos Asbestos Company. May have also contained asbestos gaskets.

9. G-60 GAS BOILER

Manufactured from approximately 1960-1968.

The cover plate was sealed with 1/2" diameter integral asbestos rope gasket, supplied by Johns-Manville. May have also contained asbestos gaskets.

10. GPH PACKAGED GAS-FIRED BOILERS

Manufactured from approximately 1963-1969.

The canopy was sealed with Johns Manville Besto-Tac adhesive asbestos tape or approved equivalent. May have also contained asbestos gaskets.

11. GPMX and GPM PACKAGED-FIRED BOILERS

Manufactured from approximately 1968-1974.

The canopy was sealed with an integral asbestos gasket for gas tight seal. May have also contained asbestos gaskets.

12. GPR GAS BOILER (WATER ONLY) SERIES 1B

Manufactured from approximately 1962-1964.

The canopy was sealed with 3/8" wide and 1/16" thick asbestos tape. May have also contained asbestos gaskets.

13. PFA-3 STEAM OR HOT WATER BOILER

Manufactured from approximately 1969-1974.
Contained asbestos gaskets.

The Clean-Out Radiator Shield assembly was lined with asbestos air cell corrugated paper with .001 aluminum foil on the flat side.

14. V-3 OIL-FIRED BOILER-BURNER

Manufactured in 1974.
Asbestos tape used on burner plate.

15. MOHAWK, WINTERWAY AND CHIPPEWA WINTER AIR
CONDITIONERS

Contained asbestos wick packing and gaskets.

16. JACKETS FOR IDEAL TYPE A 23" AND 29" BOILERS

Manufactured approximately 1920-1925.
Lined with 16 ply air cell asbestos, reinforced on both sides with 1/8" asbestos board.

17. JACKETS FOR IDEAL WATER TUBE 23" AND 29" BOILERS

Manufactured approximately 1923-1947.
Lined with 16 ply air cell asbestos, reinforced on both sides with 1/8" asbestos board.

18. JACKETS FOR IDEAL SMOKELESS BOILERS 29"

Manufactured 1925.
Lined with 16 ply air cell asbestos, reinforced on both sides with 1/8" asbestos board.

19. KEWANEE FORCED DRAFT SCOTCH PACKAGE UNIT

Manufactured 1960.
Contained asbestos packing.

20. KEWANEE-PETRO BOILER BURNER UNIT

Manufactured 1964.

Doors sealed by a riveted asbestos tape gasket.

21. JACKETS FOR KEWANEE TYPE "R" BOILERS

Manufactured 1937.

Jackets lined with multi-ply asbestos insulation.

22. KEWANEE SQUARE "R" BOILER

Manufactured 1952.

Doors sealed with asbestos rope gasket.

23. KEWANEE TYPE "C," "M" AND "R" BOILERS

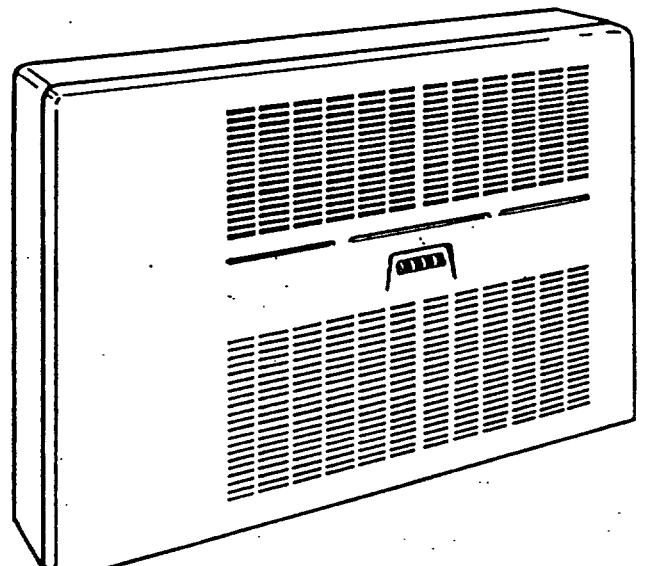
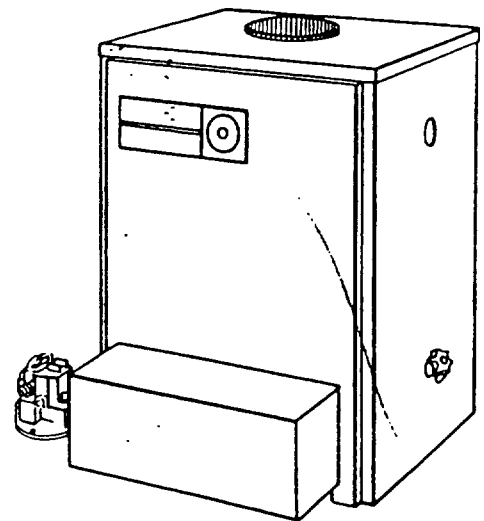
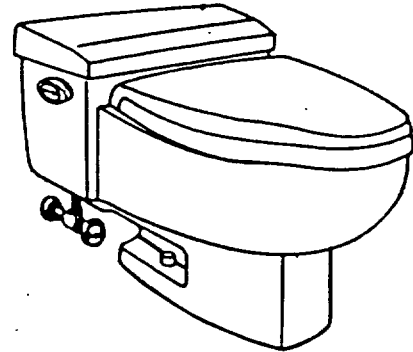
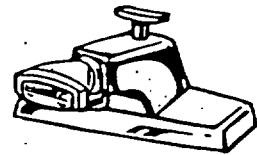
Upon information and belief, these boilers may have contained rubberized asbestos gaskets, asbestos rope and/or asbestos packing.

24. ARCOFLAME OIL BURNERS

Burner pedestal mounting contained asbestos.



official distributor list



June 1969
~~1965~~



AMERICAN-Standard
PLUMBING AND HEATING DIVISION
AMERICAN RADIATOR & STANDARD SANITARY CORPORATION

EXHIBIT

B

tabbles

EAST CENTRAL REGION

ATLANTA DISTRICT

ALABAMA

Amstan Supply Division
P. O. Box 1871, 503 S. 22nd St.
Birmingham, AL 35233 *DeWitt McDonald*
AT-A
0026-00000

Noland Co., Inc. *Raymond Mooneyhan, Pres*
Box 1352, 2204 1st Ave., South *6-11-70*
Birmingham, AL 35233 *R.G. Lee 8-28-70*
AT-A *C. Bruce Bracent*
P.H. Murphy, Mgr. P & H Dept.
0027-44467 *R.F. Widdick*
E.L. Cantrell

Noland Co., Inc.
Box 1847, 616 Church St., N. E. *Jack Williams*
Decatur, AL 35601 *Don D. Childers, Chief Clerk*
AT-A *Jimmy Keenum*
0061-44473

Noland Co., Inc. *Jim Beck, Sales Rep*
Box 860, 256 South 4th St. *220 N. 4th St. 3-5-70*
Gadsden, AL 35901 *Stanley - 5-1-70, Office*
AT-A *Tennant, 5-1-70, Office*
0067-44478

Noland Company, Inc.
Box 11026, 1250 East South Blvd.
Montgomery, AL 36111 *J.M. Barclay*
AT-A *J.M. Jackson, Chief Clerk*
0132-44490 *Roger Teal*
E.G. Strickland 8-1-70
John Mulder 1-29-70

Paine Supply Corp.
Drawer O, 100 Columbia Avenue
Sheffield, AL 35660
AT-A
0063-45970

Cole Supply Co. *Jim Hayes*
Box 1420, 520 22nd Avenue
Tuscaloosa, AL 35401
AT-A
0158-16880

FLORIDA

Horne-Wilson, Inc.
2404 WAS. 620 S. Woodward St.
Tallahassee, FL 32304
AT-A *Will H. H. H. H.*
0110-32550

GEORGIA

Horne-Wilson, Inc.
P. O. Box 405, 211 Roosevelt Ave.
Albany, GA 31701 *L. J. H. H. H. H.*
AT-A
0100-32550

Marbut Co. *Frank J. H. H. H. H.*
Box 309, 120 Oneta St. *C. H. H. H. H.*
Athens, GA. 30601 *E. H. H. H. H.*
AT-A
0005-40330

Cowan Supply Co. *W. H. Carter*
485 Bishop St., N. W. *R. H. H. H. H.*
Atlanta, Ga. 30318 *Joe Chamber*
AT-A *Walter Carter*
0010-17870 *M. DeArto*

Horne-Wilson, Inc.
163 Peters St., S. W. *C. H. H. H. H.*
Atlanta, Ga. 30313 *A. H. H. H. H.*
AT-A *Doyce Adams*
0011-32550

Noland Company, Inc. *Er. H. H. H. H.*
512 Spring St., N. W. *Charles Travis*
Atlanta, Ga. 30308
AT-A
0012-44465

Marbut Co.
Box 1544, 303 1251 New Savannah Rd.
Augusta, Ga. 30901
AT-A *Frank H. H. H. H.*
0156-40330 *Joe H. H. H. H.*

EAST CENTRAL REGION

ATLANTA DISTRICT

GEORGIA

Noland Co., Inc.
556 Reynolds St. *Per Butler 5-7-70*
Augusta, GA 30902
AT-A
0024-44466

Marbut Co. *E. W. Braker, Mgr. 7-28-69*
Box 1237, 1700 First St.
Brunswick, GA 31520
AT-A
0160-40330

Hajoca Corp. *E. Brooks*
Box 428, 1301 Sixth Ave. *Lewis Sales*
Columbus, GA 31901 *A. N. Gordy 4-1-70*
AT-A
0055-30260

City Plbg. & Htg. Sup. Co.
206 College Ave., S. E.
Gainesville, GA 30501
AT-A
0007-16585

Marbut Co. *John Butler 3-3-70*
Box 4608, 454 Terminal Ave. *E. Braker*
Macon, GA 31201 *H. Wyatt Hammack, Jr.*
AT-A *Harold L. Smith 7-15-70*
0089-40330

Noland Co., Inc. *Guy Meeks, Nat.*
Box 4687, 560 Broadway *P&H Dept. 4-13-70*
Macon, GA 31201
AT-A
0090-44486

Noland Company, Inc.
109 Clay St. *Neal Rowe*
Marietta, GA 30060
AT-A
0015-44487

GEORGIA (Cont'd)

McKenna Supply Co.
Box 3428, Sta. A, 600 W. 51st St.
Savannah, GA 31405
AT-A *H. A. Ketchum 10-2-69*
0096-41020 *George Postwell 7-15-69*
Chas. Courtney

Marbut Co.
Box 858, 321 S. Oak St. *Jerry Crosby*
Valdosta, GA 31601 *Bobby Greer*
AT-A *Don Carter*
0105-40330

NORTH CAROLINA

Hajoca Corp. *Bill Green 11-9-70*
30 Bryson St. *J. J. Boone*
Asheville, NC 28802 *Bill Butler*
AT-A
0001-30252

Hajoca Corp.
Box 1336, 3000 S. Tryon St.
Charlotte, NC 28209 *Jim O'Donnell*
AT-A *L. Durham, Mgr. 11-2-70*
0035-30257

Horne-Wilson, Inc. *H. E. Steele*
Box 969, 1210 N. Tryon St. *C. E. Derrick, Jr.*
Charlotte, NC 28201 *Joe Roman*
AT-A *G. W. Dept.*
0036-32550

SOUTH CAROLINA

Standard Wholesale Supply Co.
Box 253, 112 E. Mauldin St.
Anderson, SC 29621
AT-A
0074-57400

Sullivan Hardware Co.
Box 177, S. Main St.
Anderson, SC 29621
AT-A
0075-58000

EAST CENTRAL REGION

ATLANTA DISTRICT

SOUTH CAROLINA

Noland Co., Inc.
Box 7286. Charleston Heights, SC
2026 Meeting St. Charleston, SC 29405
AT-A
0030-44469
W. M. Blizard
Mr. Rount
W. K. Phelps
1104 S. Main St. III 7-12-70

Barkley Bilbro Supply Co.
Box 7245. 3350 Old Meeting St. Rd.
Charleston Heights, SC 29405
AT-A
0029-12300
Joe W. Avant, Pres. 7-14-70
CARL 5-11-69

Noland Company, Inc.
P. O. Box 719 (D), 730 Elmwood Ave.
Columbia, SC 29201 Randy Soter
AT-A
0048-44472
S. P. Williams, Mgr. 7-10-69
H. R. Coleman, Office Mgr. 12-2-69
C. D. Stanton
D. C. Rich

Southern States Supply Co.
Box 968, 1818 Blanding St.
Columbia, SC 29201 N. P. Murray
AT-A
0049-55950
James W. Scott, Pres. 7-21-69
Joyce Adams
H. D. C. CLAUSE

Noland Co., Inc.
413 N. Irby St.
Florence, SC 29501 Henry Spratler, Mgr.
AT-A
0066-44476
Sarah Griffin 11-8-69
Hazel Kirby
Chas. McIntyre
H. G. Gustir

Southern States Supply Co.
Box 228, 190 Sanborn St. MRS. HAZEL KIRVEN
Florence, SC 29501
AT-A
0065-55950

Standard Wholesale Supply Co.
Drawer H. Branwood Sta. U.S. Alternate 123
Greenville, SC 29610 Larry Williams
AT-A
0079-57400
Gene Williams 12-2-69

SOUTH CAROLINA (Cont'd)

Sullivan Hardware Co.
5535 Sta. B (Mail) 200 Indl. Dr.
Greenville, SC 29607
AT-A
0080-58050

Noland Co., Inc.
Box 1565, 717 Union St.
Spartanburg, SC 29301 Don Blackwell
E. C. Carson
Mr. Hyatt
P. C. Walker
E. C. Garrison, Jr.
AT-A
0085-44497

TENNESSEE

Hajoca Corp.
Box 351, 515 E. 11th St.
Chattanooga, TN 37403 D. C. King
Jim Casey
Bill Peltier
AT-A
0041-30258
Mrs. Eva Joe 7-12-70

Noland Co., Inc.
Box 1298, 1724 Central Ave.
Chattanooga, TN 37408 H. P. Pleasant
M. S. Strahle
P. S. Totten
E. J. Wooten 7-6-69
AT-A
0043-44471
Greer Smiley 10-20-69
B. B. Fox 4-27-70

Amstan Supply Division
Box 117, 714 Willow Ave.
Knoxville, TN 37915 Tom Kiddier
AT-A
0115-00000

Willis Supply Co.
Box 3126, 1132 Sixth Ave., NE
Knoxville, TN 37917 W. L. Willis
AT-A
0117-66650
Sheldon L. Walker

Amstan Supply Division
Box 799 37202, 1700 Church St.
Nashville, TN 37203
AT-A
0136-00000

EAST CENTRAL REGION

ATLANTA DISTRICT

TENNESSEE (Cont'd)

Noland Co., Inc.
Box 729, 72 Trimble St.
Nashville, TN 37210
AT-A
0139-44491

*Richard Russell office Mgr.
Lane Minatra
Mr. Brown
Jerry Precor 3-26-70*

EAST CENTRAL REGION

BALTIMORE DISTRICT

MARYLAND (Cont'd)

Frederick Trading Co.
Box 400, 225 East 8th St.
Frederick, MD 21701
BA-A
0681-24600

Noland Co., Inc.
Box 700, 300 Scholl's Lane
Frederick, MD 21701
BA-A
0684-44477

Noland Co., Inc. *W. L. Smith, D.M.*
Box 728, 1016 Virginia Ave. *Don Hurley*
Hagerstown, MD 21740 *J. B. Nugent*
BA-A *L. D. Rowen*
0684-44479

The Reichard Supply Co.
140 S. Potomac St.
Hagerstown, MD 21740
BA-A
0686-50650

Western Maryland Supply Co.
Box 678, 817 Main Ave. *J. A. Boyer*
Hagerstown, MD 21740
BA-A
0688-65600

Raub Supply Co. *H. Fawcett*
Drawer C, 3 1/2 miles North on Route 1
Laurel, MD 20810
BA-A
0645-50350

Shore Distributors, Inc. *Sally Phillips 8-7-69*
Box 2017, Brown & Naylor Sts. *E. W. Davis, Commercial Sales Rep.*
Salisbury, MD 21801 *Sharon Harte, Sec.*
BA-A *Eleanor Morris*
0649-54800

MARYLAND (Cont'd)

Speakman Co.
Box 261, South Salisbury Blvd.
Salisbury, MD 21801
BA-A
0650-56200

VIRGINIA

Raub Supply Co.
Box 940
Winchester, VA 22601
BA-A
0689-50350

Western Maryland Supply Corp.
Box 887, Beau St. & Ohio Ave.
Winchester, VA. 22601
BA-A
0692-65600

WEST CENTRAL REGION

DALLAS DISTRICT

TEXAS

West Texas Wholesale Supply Co.
Box 1020 79604, 401-409 Plum St.
Abilene, TX 79601
DA-B
8100-65400

Amstan Supply Division
Box 1306 79105, 1400 W. 6th Ave.
Amarillo, TX 79101
DA-A
8108-00000

Chas. Hogan Plumbing Supplies
Box 1487 79105, 708-720 W 5th Ave.
Amarillo, TX
DA-B
8109-32100

Weakley-Watson *Linda Buford 12-2-69*
Box 1309 76802, 100-105 Fisk St.
Brownwood, TX 76801 *J. T. Fisher*
DA-A *Joe W. Blagg*
Mrs. Martha Chandler
8134-64500 *Mrs. Enla Pallette*

Amstan Supply Division
Box 10247, 1501 N. Industrial Blvd.
Dallas, TX 75207 *Ellie Gotcher 10-10-69*
DA-A
8146-00000

Jahns Supply Co.
Box 35666, 2411 Shore Crest
Dallas, TX 75235 *Bob Chambers*
DA-A
~~8141-34650~~
34649

Southland Supply Co., Inc. *Janie Harris*
Box 2011 (75221) 2034 Amelia St. *Bob Remond 10-7-69*
Dallas, TX 75235 *R.V. Lentz*
DA-A *Mrs. Phil McLeskey*
8148-56100 *Miss Kathy Holmes*

TEXAS (Cont'd)

Southland Supply Co., Inc.
Drawer G, 75021, 607 S. Mirick Ave.
Denison, TX 75020
DA-B
8140-56100

Amstan Supply Division
Box 1135, 76101 - 101 E. Industrial
Fort Worth, TX 76111
DA-A
8155-00000

Jahns Supply Co.
Box 1717 76101, 2532 Cullen
Fort Worth, TX 76107 *Ed. Piedra*
DA-A *Alice Welsh?*
Jim E. Adams
8153-34650 *Mrs. Alice Jcill*
Ken Johns 6-30-70

Weakley-Watson *P.O. Box 10237*
2305 Avenue H
Lubbock, TX 79404 *Barney Crume*
DA-B
8179-64500

Westway Supply Co., Inc.
Box 231 79408 - 130 E 42nd. St.
Lubbock, TX 79404
DA-B *Ray Johnson*
8175-65950

Weakley-Watson
Box 5025, 79702, 11 Industrial Loop
Midland, TX 79704
DA-B
8112-64500

Hunt Plbg., Co., of Mt. Pleasant
Box 541, 310 E. 9th St.
Mt. Pleasant, TX 75455
DA-B
8199-33200

WEST CENTRAL REGION

DALLAS DISTRICT

TEXAS (Cont'd)

Hunt Plbg. Sup. Co., of Nacogdoches
Box 908, 223 W. Main St.
Nacogdoches, TX 75961
DA-B
8206-33200

Hunt Supply Co., Inc.
Drawer 111, 122 N. Church St.
Nacogdoches, TX 75961
DA-B
8206-33200

Simmons-Huggins Supply Co., Inc.
Box 1790, 425 N. Randolph St.
San Angelo, TX 76902 *N. R. Huggins*
DA-A
8197-35000

Johnson-Burks Supply Co., Inc. *F. A. Johnson*
Box 936 75091, 702-6 E. Lamar St.
Sherman, TX 75090
DA-B
8197-35000

Hunt Plbg. Sup. Co. of Texarkana
Box 44 75502, Fourth St. & Ward *Wm. H. Van Zandt, mgr.*
Texarkana, TX 75501
DA-B
8204-33200

Southland Supply Co., Inc.
Box 2015 75702-316 S. Glenwood Blvd.
Tyler, TX 75703 *John P. Penn*
DA-A *Iris Trevelyan*
8209-56100

TEXAS (Cont'd)

The Rohan Co., Inc.
Box 7337, 5000 Franklin Ave.
Waco, TX 76710
DA-B *Bill Brown*
8212-52200

Amstan Supply Division
Box 2530 76307, 3710 Callfield Rd.
Wichita Falls, TX 76308
DA-A
8214-00000

PACIFIC REGION

DENVER DISTRICT

TEXAS

Amstan Supply Division
Box 3056, 79923, 160 M. Piedras St.
El Paso, EX 79905
DV-A
8157-00000

Consolidated Electrical Distributors
Box 137, 79941, 2000 Texas St.
El Paso, TX 79901 *John E. Ganty, P.A.*
DV-A *John Warden, Jr.*
8158-17280 *Harry White*

WYOMING

N. O. Nelson Co.
802 East "C" St. *Jim Ropper*
Casper, WY 82602
DV-A
2707-43920

Big Horn Plumbing Supply Co.
232 Grinnel Ave.
Sheridan, WY *Vic Slack*
DV-A
2765-13170

New Mexico

Consolidated Electrical Distributors
Box 4938 #9 BACA ST.
Santa Fe, N.M. DV-2
87501

DV-B
8186-17285

EAST CENTRAL REGION

FLORIDA DISTRICT

FLORIDA

Peerless Florida Co., Inc.
Box 1200, 1419 S. Greenwood
Clearwater, FL 33516
FL-B
0415-46300

Gorman Co. of Daytona Beach
Box 2139, 721 Ballough Road
Daytona Beach, FL 32022
FL-A *J.L. Friedrich*
0059-27007

Bond Plbg. Supply, Inc.
430 N. Flagler Drive
Fort Lauderdale, FL 33301
FL-B
0400-13890

Monmouth Plbg. Supply Co., Inc.
Drawer M So. Broward Sta.
1909 SW 1st Avenue *MR. Knowles*
Fort Lauderdale, FL 33315
FL-A
0401-42640

Castle Supply Co., Inc.
2581 Palm Ave.
Fort Myers, FL 33901
FL-B
0414-15700

Horne-Wilson, Inc.
2345 Union St.
Fort Myers, FL 33901
FL-A
0412-32550

Horne-Wilson, Inc. *H.G. Thomas, Dist. Clerk*
Box 1828, 745 W. Forsyth St. *W.H. Co. 372*
Jacksonville, FL 32204 *Chas. E. ...*
FL-A
0083-32550

FLORIDA (CONT'D)

Noland Co., Inc.
Box 4610, 929 E. Bay St.
Jacksonville, FL 32202
FL-A
0084-44482

Gorman Company of Melbourne
330 Fee Avenue
Melbourne, FL 32901 *Mr. Hairs*
FL-B
0177-27009

Bond Plbg. Supply, Inc.
1250 N. W. 23rd St.
Miami, FL 33142
FL-B
0403-13890

Horne-Wilson, Inc.
Box 52-156, *Mr. Hordley*
3401 N. W. 31st St. *Don D'Arco*
Miami, FL 33142
FL-A
0404-43550

Monmouth Plbg. Supply Co., Inc.
Box 3350, 63-79 N. W. 9th St.
Miami, FL 33101
FL-A
0406-42640

Gorman Company of Ocala
Box 1647, 614 N. Watula St.
Ocala, FL 32670
FL-B
0064-27010

Bond Plbg. Supply, Inc.
1301 Atlanta Avenue
Orlando, FL 32806
FL-B
0168-13890

EAST CENTRAL REGION

FLORIDA DISTRICT

FLORIDA (CONT'D)

Horne-Wilson, Inc.
Box 952, 1111 Virginia Dr.
Orlando, FL 32803
FL-A *Lee Tally, Mgr.*
0167-32550

Southern Pipe & Supply Co.
(Div. of Hajoca Corp.)
Box 3749, 630 W. Church St.
Orlando, FL 32802
FL-B
0173-55947

Palmetto Pump & Irrigation Co., Inc.
Box 127, 841 - 7th Avenue
Palmetto, FL 33561
FL-B
0411-46091

Castle Supply Co., Inc.
226 - 15th St., North
St. Petersburg, FL 33705
FL-B
0419-15710

Horne-Wilson, Inc.
Box 7186, 2440 - 30th Ave., N.
St. Petersburg, FL 33713
FL-B
0421-32550

Castle Supply Co., Inc.
Box 1634, 425 School Ave.
Sarasota, FL 33577
FL-B
0423-15710

Horne-Wilson, Inc. *Howard L. Mgr.*
Box 2802, 223 - 12th St. *3rd Floor*
Tampa, FL 33602
FL-A
0427-32550

FLORIDA (CONT'D)

Monmouth Plbg. Supply Co., Inc.
Box 2585, 437 Iris St.
West Palm Beach, FL 33410
FL-A
0431-42640

Bond Plbg. Supply, Inc.
811 - 27th Street
West Palm Beach, FL 33407
FL-B
0432-13890

WEST CENTRAL REGION

HOUSTON DISTRICT

TEXAS

Amstan Supply Division
Box 1966, 78767 - 401 E. 2nd St.
Austin, TX 78701
HU-A
0300-00000

Hunt Plbg. Supply Co. of Conroe
Box 36, 100 S. First St.
Conroe, TX 77301
HU-B
0325-33200

Standard Plbg. Sup. Co. ⁷⁸⁴⁰⁴
Box 7009, 2833 Holly Road
Corpus Christi, TX 78415
HU-B *Martin D. Kirby*
0315-56720 *W. C. Johnston*

Bush Supply Co.
Box 1951, 78551, 1101 W. Jackson St.
Harlingen, TX 78550 *N. E. Wilson*
HU-B
0312-15030

Amstan Supply Division
Box 1969, 77001 - 419 Dowling St.
Houston, TX 77003
HU-B
0327-00000

Gulf Plumbing Supply Co.
Box 445, 77001, 2221 Pease
Houston, TX 77003
HU-B
0328-28750

Plumbing Supply Co.
Box 2009, 77001, 2600 Texas at Live Oak
Houston, TX 77005 *Ben L. Lusk*
HU-B *Tommy Hoffmann*
0329-47140 *P. J.*

TEXAS (Cont'd)

Bush Supply Co.
Box 1420, 78502, 2221 Austin St.
McAllen, TX 78501
HU-B
0310-15030

~~Amstan Plbg. Sup. Inc.~~
~~Box 12349, (78212), 611 N. Main~~
~~San Antonio, TX 78205~~
~~HU-D~~
~~0335-10570~~

Amstan Supply Division
Box 1809, 78206, 1101 Broadway
San Antonio, TX 78215
HU-A
0336-00000 *Ray Haby 781-09*

Mars Plbg. Supply Co.
Box 7448, Sta. A. 1103 S. Frio
San Antonio, TX 78207
HU-B
0339-40390

Service Supply of Victoria, Inc.
Box 1519, 77903, 1319-25 Goliad Dr.
Victoria, TX 77901
HU-B
0343-54100

~~Service Supply of Houston, Inc.~~
~~Box 7557, 3219 White Oak Drive~~
~~Houston, Texas 77007~~
~~0346-54101~~
~~HU-D~~

~~Service Supply San Antonio Division~~
~~1350 N. Colorado~~
~~San Antonio, TX 78207~~
~~HU-D~~
~~0347 54102~~

HU-1

EAST CENTRAL REGION

NEW ORLEANS DISTRICT

ALABAMA

Noland Company *(Noy Supply Co. Inc. 1010 3rd)*
Box 7217, 36607, 93 Sidney Phillips Dr.
Mobile, AL 36610 *Gene Starnes*
NO-A *W. E. Starnes*
5184-40690 *C. H. Starnes*
J. Jones
Ray Howell

ARKANSAS

The American Supply Corp.
Box 1071, 71731, 1304 E. Hillsboro
El Dorado, AR 71730
NO-B *Gerald D. Clark*
5188-11170

FLORIDA

Chas. A. Born Co.
Box 1985, 32502, 150 E. Chase St.
Pensacola, FL 32501
NO-A *E. ...*
5208-13980

LOUISIANA

The American Supply Co., Inc.
Drawer 5585, So. Pk. Sta., 3333 Bway.
Alexandria, LA 71303
NO-A *J. M. Swanson, Jr., Dist. Dir.*
5100-11140 *W. K. Hinton, Mgr. P.H.C. Div.*

Baton Rouge Plbg. Sup. Co.
Box 1567, 6425 Greenwell Springs Rd.
Baton Rouge, LA 70806
NO-B
5107-12430

Harry Cash Co., Inc.
Box 946, 70821, 2312 North 21st St.
Baton Rouge, LA 70802
NO-B
5106-15650

LOUISIANA (Cont'd)

Farris Plumbing Supply Co.
1900 W. Main St.
Houma, LA
NO-B
5202-23400

American Supply of Lafayette, Inc.
1104 Oil Center Station, 70505
214 Pinhook Rd.,
Lafayette, LA 70501
NO-B
5109-11230

Craft-Rushworth, Ltd.
Box G, 1920 Ryan St.
Lake Charles, LA 70601
NO-A
0390-17900

Weeks Supply Co., Ltd.
Box 1572, 71203, 200 N. 4th St.
Monroe, LA 71204 *Joe L. Syone*
NO-A *W. E. ...*
5190-64550

Amstan Supply Division
Box 13098, 1120 S. Jefferson Davis
Pkw.
New Orleans, LA 70125
NO-A
5201-00000

Bolton Plbg. Sup., Inc.
1995 Gentilly Blvd.
New Orleans, LA 70119
NO-B
5205-13870

Harry Cash Co., Inc.
811 Daniel Street
Kenner, LA, 70062
NO-B
5204-15650

EAST CENTRAL REGION

NEW ORLEANS DISTRICT

LOUISIANA (Cont'd)

Amstan Supply Division
Box 3546 - 71103
2307 Texas Ave.
Shreveport, LA 71101
NO-A
5214-00000

Weeks Supply Co., Ltd.
Box 3037, 1617 Texas *A.R. Vestal*
Shreveport, LA 71103 *P. McPitt*
NO-B
5217-64550

MISSISSIPPI

Delta Plbg. & Elec. Sup. Co., Inc.
Box 284, 38931, 824 1/2 Carrollton Ave.
Greenwood, MS 38930
NO-BA
5143-20850

Paine Supply Co.
Box 1150, 39502, 21st St. at I. C. R. R.
Gulfport, MS 39501
NO-B
5116-45940

Paine Sup. Co., of Hattiesburg, Inc.
Box 1874, (39402), 1502 N. Main
Hattiesburg, MS 39401
NO-BA
5150145930

Noland Co., Inc.
3260 (39207), 1350 Highway 80 West
Jackson, MS 39204 *J. Arrender*
NO-A
5159-44481 *L. A. Jones Office*
and Jones (Alperen)
Chas. R. Jones
and Jones

MISSISSIPPI (Cont'd)

General Sup. & Mach. Co.
Box 230, 208-19th Ave.
Meridian, MS 39302
NO-BA
5179-26250

Weeks Supply Co., Inc.
(of Mississippi)
Box 1228 39121, 109 S. Broadway
Natchez, MS 39120
NO-B *E. F. Haggard Office*
5111-64600 *Mr.*

Paine Supply Corp.
Box 1009, 38802, 203 Elizabeth
Street
Tupelo, MS 38804 *Billy Hamilton*
NO-A *Clarence Tidwell*
5224-46000

Paine Sup. Co. of Pascaquoula, Inc.
Box 1326 Main Sta., 111 Market St.
Pascagoula, MS 39567
NO-A
5117-45945

EAST CENTRAL REGION

PITTSBURGH DISTRICT

OHIO

The Standard Supply Co.
P.O.Box 119, 1004-12 Findlay St.
Portsmouth, OH 45662
PH-A
6375-57300

PENNSYLVANIA (Cont'd)

Amstan Supply Division
1315 Ridge Ave. *Clyde Pombach*
Pittsburgh, PA 15233
PA-A
6328-00000

PENNSYLVANIA

Amstan Supply Division
P.O.Box 271, 1601-17 S. Branch Ave.
Altoona, Pa. 16602
PH-A
6300-00000

The W.G. Balph Co. *Wm. Balph*
311 Brushton Ave. *Miss Ruth Peterson*
Pittsburgh, PA 15221 *W. Thompson*
PA-A *Catherine*
6332-12210

Anchor Supply Co.
Box 8567, Pittsburgh, Pa. 15220 *Tim Schwab*
Hope Hollow Road, Carnegie, PA 15106 *Rose Wittas*
PH-A *Jack Hecker*
6330-11320 *Mrs. Mary Miller*
B. Vetter
Miss Gretchen
Wayne Coussey
C. Schauble, P.A.
Harold McCreevy

Eckstein Co.
1525 Beaver Ave.
Pittsburgh, PA 15233
PH-A
6335-22200

Amstan Supply Division
Oak & Murdock
Johnstown, PA 15902 *Al L. Custer*
PH-A
6301-00000

Fort Pitt Sup. Co. *Robt. D. Bailey*
1021-29 East Ohio St. *Dorothy*
Pittsburgh, PA 15212
PH-A
6336-24300

The Fischler Co. *Jack Handtke*
Box 988, 1900 Butler Rd.
New Castle, PA 16101
PH-A
6349-23750

Buchanan-Williamson Sup. Co.
P.O. Box 933
Grundy, VA 24614
PH-A
6308-14790

VIRGINIA

Amstan Supply Division
6587 Hamilton Ave.
Pittsburgh, PA 15206
PH-A
6329-00000

WEST VIRGINIA

Bluefield Supply Co. *Sherman L. Blong*
Mercer & Bluefield Aves. *G. R. Walker*
Bluefield, WV 24701 *Carl Hendrickson*
PH-A *Miss Christina Amel*
6306-13830 *Ernest Varney*
J. H. ...

PH-1

PACIFIC REGION

SEATTLE DISTRICT

ALASKA

American Plbg. & Steam Supply Co.
1425 Spar Avenue
Anchorage, AK 99501
SE-A
7735-11080

~~General Supply Co. of Alaska, Inc.~~
Box 440, Alaska R.R. Industrial Area
Fairbanks, AK
7528-16190

IDAHO

Hahn Supply Co.
2101 Main St.
Lewiston, ID 83501
SE-B
7507-30200

OREGON

Consolidated Supply Co.
Box 210, 97401, 110 N. Garfield St.
Eugene, OR 97402
SE-A
7503-17330

Tillman & Booth, Inc.
Box 1148, 215 W. 5th Avenue
Eugene, OR 97401
SE-A Miss Mary Rhall, Sec.
7504-60900 Mrs. Pat Persenson Sec.

Tillman & Booth, Inc.
Box 589, 1335 S. 6th St.
Klamath Falls, OR 97601
SE-A
7505-60900

OREGON (Cont'd)

Tillman & Booth, Inc. Medford Div.
Box 817, 631 N. Fir
Medford, OR 97501
SE-A
7506-60905

Consolidated Supply Co.
Box 1771, 97207, 2300 NW 26th Ave.
Portland, OR 97210 *Thos. P. McKay*
SE-A *R. H. Higgins, Asst. Sales Mgr.*
7512-17330 *Maren Gram, Submittals*
Edna Christie, Sec.
James P. Curry, Plbg. Dep.

Grinnell Co. of Oregon
3240 N. W. 29th St.
Portland, OR 97210
SE-A *Duane K. Perigo*
7513-27575

Standard Supply Co. *Donald W. Litz*
934 S. E. 6th Ave. *J. L. Breitbarth,*
Portland, OR 97214 *Asst. Mgr.*
SE-B *John A. Caldwell*
7515-57250

Consolidated Supply Co.
Box 7362, 1525 Tile Rd. N. E.
Salem, OR 97303
SE-A
7511-17330

WASHINGTON

Johnson's Wholesale Plbg. Inc.
2110 37th St.
Everett, WA 98201
SE-A
7527-35110

PACIFIC REGION

SEATTLE DISTRICT

WASHINGTON (Cont'd)

Consolidated Supply Co.
Box 6004, 900 E. Bruneau St.
Kennewick, WA 99336
SE-A
7557-17360

United Supply Co.
Box 672, 1212 Baltimore St.
Longview, WA 98632
SE-B
7538-62225

Bowles Northwest Co., Inc.
700 N. Northlake Way
Seattle, WA 98103
SE-A
7518-14130

Grinnell Co. of the Pacific
3101 Elliott Ave.
Seattle, WA 98121
SE-A
7521-27610

Johnson's Wholesale Plbg., Inc.
517 Aloha St.
Seattle, WA 98109
SE-A
7522-35115

Palmer Supply Co. *Mrs. Midge Hansen*
250 Andover Park West *Inez Staudt*
Seattle, WA 98188
SE-A
7524-46090

Seattle Plbg. Supply Co.
590 First Ave., S.
Seattle, WA 98104 *W.C. Gable*
SE-A
7525-54000

WASHINGTON (Cont'd)

Consolidated Supply Co.
Drawer 226 (Mail) 99210 W.
1121 Gardner Ave.
Spokane, WA 99201 *Dennie Knopp*
SE-A *Geo. W. Shoen, Asst. Sales Mgr.*
7531-17360 *P.H. Norman, II*
Bill Welsh

Grinnell Co. of the Pacific
E. 909 Sprague
Spokane, WA 99202
SE-A *Bill Penfield Sales Div*
7532-27615

American Plumbing & Steam
Supply Co.
1908-16 Pacific Ave.
Tacoma, WA 98401
SE-A
7540-11080

United Supply Co.
Box 1236, 1114 S. 30th St.
Tacoma, WA 98401
SE-A
7541-62250

United Supply Co.
Box 610, 805 W. 11th St.
Vancouver, WA 98660
SE-A
7516-62300

Consolidated Supply Co.
Box 1298, 4th & Poplar St.
Walla Walla, WA 99362
SE-A
7547-17360

United Supply Co.
Box 459, 1100 Walla Walla Ave.
Wenatchee, WA 98801
SE-A
7551-62350

PACIFIC REGION

SEATTLE DISTRICT

WASHINGTON (Cont'd)

Inland Pipe & Sup. Co.
Box 587, 102 S. Front St.
Yakima, WA 98901
SE-B
7554-33800

United Supply Co.
Box 982, 201 Second Ave., N.
Yakima, WA 98901
SE-A
7555-62400

WEST CENTRAL REGION

ST. LOUIS DISTRICT

TUCKY (Cont'd)

Ohio Valley Supply Co., Inc.
Box 1120, 9th & Harrison Sts.
Paducah, KY 42001
SL-A
6945-45270

MISSOURI

N. O. Nelson Co. of Cape Girardeau
2118-20 Broadway
Cape Girardeau, MO 63701
SL-A *David H. Lange, V.P.*
6946-43918

Ahrens & McCarron, Inc.
Box 636, Interstate 70 East
Columbia, MO
SL-A
6922-10430

King Products & Supply Co.
Highway 54 East
Mexico, MO 65265
SL-A
6927-36290

Ahrens & McCarron, Inc.
4621 Beck Ave.
St. Louis, MO 63116 *L. Koenig*
SL-A
6960-10420

Aalco Plbg. Sup. Co.
1422 Evergreen Ave.
St. Louis, MO 63133
SL-A
6967-26150
10145

Atlas Plbg Sup. Co.
3878 Easton Ave.
St. Louis, MO 63113 *Harry Weintrop*
SL-A *M. K. S. F. F. F.*
6962-11810

MISSOURI(Cont'd)

Grinnell Co., Inc. *Mrs. Ellen Bene*
1615 S. Kingshighway *A. B. Ebeling*
St. Louis, MO 63110
SL-A
6963-27590

Rojaca, Inc.
5364- Easton Ave. *E. W. Miles*
St. Louis, MO 63112
SL-A
6965-52250

Tallman Co., Inc. *E. F. Schweickardt*
6425-37 Maple Ave.
St. Louis, MO 63130
SL-B
6968-60100

The Harry Yelton Co.
3740 Sullivan Ave.
St. Louis, MO 63107
SL-A
6964-67500

TENNESSEE

Tennessee Pump & Supply Co.
Box 1147, 328 Airways
Jackson, TN 38301 *Howard Ganoe*
SL-A
6921-60400

Amstan Supply Division
Box 258, ~~666 Beale Ave.~~ *1324 Springbrook*
Memphis, TN ~~38101~~ *38116*
SL-A
6935-00000

Noland Co., Inc.
4129 Cross Town Sta., 324 S. Hollywood
Memphis, TN 38104
SL-A *W. R. Schreck, office mgr*
6941-44489 *T. L. Schreck*
W. R. Schreck