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JMI

Johns-Manville
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Denver, Colorado 80217
(303) 759-1000

PLAINTIFF'S
EXHIBIT

JM-1648

June 23, 1978

Francis H. Marshall, Esq.
Marshall, Dennehey & Warner
1115 Locust Street
Philadelphia, PA 19102

Re: Anthony Giradi and Lucy Marie Giradi v. Turner &
Newall, Ltd. and Canadian Johns-Manville Asbestos,
Ltd., et al

Dear Mr. Marshall:

In Civil Action No. 78-1987 in the United States District
for the Eastern District of Pennsylvania and styled Anthony
Giradi and Lucy Marie Giradi v. Turner & Newall, Ltd.,
Canadian Johns-Manville Asbestos, Ltd., et al, I am enclosing
the following:

1. Summons,
2. Certification,
3. Complaint.

Service was obtained on Canadian Johns-Manville Asbestos,
Ltd., and Canadian Johns-Manville Co., Ltd. through the
Secretary of the Commonwealth of Pennsylvania on June 19,
1978. I do not know when these pleadings were received by
Johns-Manville's Canadian entities.

Aside from the two J-M entities, there are six other defendants
in this matter. According to Paragraph 3 of the Complaint,
the plaintiff, Anthony Giradi, worked for Certainteed Products
of Ambler, Pennsylvania, from 1932 to 1978. The plaintiff
allegedly contracted "mesothelioma and/or asbestosis" as a
result of being exposed to the defendants' asbestos. The
plaintiffs seek recovery for compensatory and punitive
damages in an amount "in excess of \$500,000".

The plaintiff's employer, Certainteed Corporation, is a
direct defendant in a number of pending asbestos cases
throughout the country. Certainteed Corporation manufactured
and distributed a variety of asbestos insulation products.
Since Certainteed was a knowledgeable manufacturer and user
of asbestos, it can be asserted that there is no duty to
warn a purchaser who has equal knowledge of the hazard.

Francis E. Marshall, Esq.

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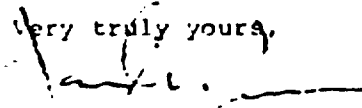
June 28, 1978

Actually, this contention can be used in two separate defenses, i.e., no duty to warn, and intervening cause. We have been involved in similar situations in other jurisdictions, one which comes to mind initialing is the Raybestos-Manhattan suits out of New Jersey. You may find it rewarding to contact our New Jersey counsel, David Gross, of the firm of Budd, Lerner, Kent, Gross, Picillo & Rosenbaum, 33 Washington Street, Newark, New Jersey 07102 (201-622-7400) to obtain his views on how to defend this type of case. I expect he can provide you with some law which may be of assistance.

You should also initially be aware of the fact that since J-M Canadian Corporation's are being sued, our position in these cases is considerably different from where J-M's U. S. entities are defendants. Canada has some curious and very restrictive laws concerning developing corporate information and documentation which has been raised in the New Jersey litigation.

Please proceed to enter an appearance on behalf of and take all steps necessary to protect the interests of Canadian Johns-Manville Asbestos, Ltd. and Canadian Johns-Manville Company, Ltd.

Very truly yours,


James K. Green
Senior Attorney

JKG/re

Enclosures

cc: Alexander Unkovic, Esq.; Robert Reuter; Robert Zols;
Ron Sherran; Ron Perry; Neil McHugh; Walter Curtner;
David Gross, Esq.