PLAINTIFF'S EXHIBIT

RB-31

18TH JUDICIAL DISTRICT COURT FOR THE PARISH OF IBERVILLE

STATE OF LOUISIANA

NUMBER: 49,702 DIVISION "B"

NOLAN PUGH, SR., ET AL

VERSUS

OWENS CORNING (CORP.), ET AL.

FILED: _____ _____
DEPUTY CLERK

AMENDED INTERROGATORIES

TO: **PLAINTIFF,**
by and through your attorney of record.

REILLY-BENTON COMPANY, INC. hereby requests that a representative of the above-named party, by any officer or agent, answer separately and fully in writing under oath each of the following written interrogatories, or if objection is made that the reasons for each objection be given, and that said answers, sworn to and signed by the person making them, and any objections signed by the attorney making them, be served upon undersigned counsel within fifteen (15) days from the date of mailing and service of these interrogatories, all pursuant to Articles 1457, et seq., and other applicable articles of the Louisiana Code of Civil Procedure and/or other applicable laws. It is further requested that all responses be seasonably supplemented and/or amended as the case may be as required by Article 1428 of the Louisiana Code of Civil Procedure. Each interrogatory is addressed to all such information as is available to the named party, including but not limited to the business records of said party and the personal knowledge of its several officers, agents, employees, representatives, directors, stockholders, members, partners and/or owners, and that of its attorneys, investigators and insurers.

INTERROGATORY NO. 1:

List all products, which you state in your Petition, that Reilly-Benton Company, Inc. sold giving the dates the products were sold to your place of employment and the dates when you could have come into contact with said products

MARC CASSISA
LOTT & DAVIS

INTERROGATORY NO. 2:

Please identify and describe each and every asbestos-containing product **(by brand name)** that plaintiff used, or was exposed to, that was sold by Reilly-Benton Company, Inc. and the place, date and circumstances of each exposure.

INTERROGATORY NO. 3:

Please identify the source, including the name, address and telephone number, or in the case of a document, a description and date of the document, of any and all information relied upon by you to allege that plaintiff was exposed in any manner to asbestos containing products sold by Reilly-Benton Company, Inc.

INTERROGATORY NO. 4:

Please identify by name, address and present occupation of each and every witness whom you intend to call upon at the trial of this matter to testify that plaintiff at any time used or was exposed to any asbestos containing materials sold by Reilly-Benton Company, Inc.

INTERROGATORY NO. 5:

With respect to your answer to the preceding Interrogatory, please identify the work site dates, location and circumstances of each such instance, which will be testified to by the witnesses identified in your answer to the preceding interrogatory.

INTERROGATORY NO. 6:

Do you expect to call any expert witnesses at the trial of this case whose testimony will be directed toward proving the liability of Reilly-Benton Company, Inc.? If so, with regard to each such expert witness, please state:

a) His/her name, address and telephone number and the substance of the opinions to which he/she is expected to testify. A copy of a report from the expert may be attached in lieu of the above.

INTERROGATORY NO. 7:

Have you voluntarily dismissed your claims against any defendant? If so, please identify the defendant who has been voluntarily dismissed and the date of said dismissal.

INTERROGATORY NO. 8:

Have you settled or otherwise compromised any of your claims against any party for any asbestos-related injury? If so, please identify the party with whom settlement or compromise has occurred and the date of each such settlement or compromise.

HARD CASSIDY
LLOYD & DAVIS
METAIRIE, LA

INTERROGATORY NO. 9:

Please identify and acknowledge the first date you were put on notice that asbestos-containing products would be harmful to your health.

INTERROGATORY NO. 10:

Please identify all evidence, which you are aware of, to establish that Reilly-Benton Company, Inc. ever sold any asbestos-containing products to any work site where plaintiff could have been in close proximity to ingest the asbestos-containing products.

INTERROGATORY NO. 11:

If you deny Request for Admission No. 3 please list all co-workers who worked with plaintiff at any facility who can testify and/or has testified that plaintiff handled and/or worked around asbestos-containing products sold by Reilly-Benton Company, Inc.

Respectfully submitted,

BERNARD, CASSISA, ELLIOTT & DAVIS
A Professional Law Corporation

BY _____

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a notice of the foregoing pleading was mailed, via United States mail, to the attorneys of record for all other parties in this action by placing notice in the United States mail, with sufficient postage to insure delivery on the 5th day of November, 2001.

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