

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

IN RE: ALL BARON & BUDD CASES
IN WHICH CORHART REFRACTORIES,
COMPANY IS NAMED AS DEFENDANT

Plaintiffs,

vs.

A-BEST PRODUCTS COMPANY, ET AL.,

Defendants.

ASBESTOS MASTER CASE
NUMBER 073958

JUDGE HARRY HANNA

Now comes Defendant Corhart Refractories Co. ("Corhart") and provides the following Responses to Plaintiffs' Master Set of Interrogatories Propounded to Corhart Refractories Co. and Plaintiffs' Request for Production of Documents Propounded to Corhart Refractories, Inc. in the above-captioned matters. Although this document does not reiterate Plaintiffs' Master Set of Interrogatories or Requests for Production of Documents, Corhart represents that each Answer to Plaintiffs' Interrogatories and each Response to Plaintiffs' Request for Production of Documents is a complete Response to each and every portion of Plaintiffs' Discovery Requests.

PRELIMINARY STATEMENT AND OBJECTIONS
CORHART'S ANSWERS TO INTERROGATORIES

Defendant, Corhart's responses to these Interrogatories and Requests for Production of Documents ("Document Requests") each incorporate this Preliminary Statement and these General Objections.

Corhart has been involved in the production of refractory products since the 1920's, initially for the glass making industry and later for the steel making industry. The refractory products manufactured by Corhart for the use in the steel making industry did not contain asbestos. To the best of its knowledge, the only asbestos product provided by Corhart was an asbestos expansion spacer which was utilized for thermal expansion in open hearth roofs. To the best of its information, the asbestos expansion spacer was provided at the customers request and at no cost. As Corhart did not manufacture or sell for cost this asbestos product, Corhart contends it did not manufacture or sell or distribute an "asbestos containing product" and answers these discovery requests accordingly.

Many of the events that may be relevant to the issues in this litigation occurred decades ago. Many of the individuals who might have had personal knowledge of the matters to which plaintiffs' requests relate are deceased or are otherwise unavailable to Corhart and investigations to date lead Corhart to believe that to the extent that documents relating to the matters inquired about may have previously existed, some of them would have been among old business records that were discarded in the regular course of business.

Furthermore, no single individual is now available who is aware of all facts relevant to this litigation. Information has been assimilated from those records that still exist from former employees. Accordingly, Corhart can only relay this information; it cannot attest to the completeness or accuracy of information so collected. Information of this nature is being supplied because it may lead to the discovery of admissible evidence.

For these reasons, the information being provided in these responses may be incomplete. Corhart is engaged in a continuing investigation into the subject matter sought by this discovery, and its responses are based upon the information developed to date. Corhart cannot rule out the possibility that such investigation may, at some time, yield additional information, or information which may be at variance with the information that is now being supplied. Corhart reserves the right to supplement these responses at a future date if additional information is discovered.

Corhart generally objects to these interrogatories and requests as being unduly burdensome, harassing, oppressive, vexatious, boiler plate, overly broad as to time, scope, location, vague, lacking in particularity and repetitious. Objection is made to the extent these requests assume the truth of facts not proven or facts not in evidence. Objection is made to these Interrogatories and Requests for Production on the grounds that they seek information which is not relevant or not reasonably calculated to lead to the discovery of admissible evidence. In particular, Corhart objects to those Interrogatories and Requests for Production that request information regarding the ultimate sales or distribution of products in the subject jurisdiction and that did not directly affect the sale or distribution of products by Corhart which sales did not occur in the subject jurisdiction; and/or which may not lead to the discovery of admissible evidence regarding product shipments that may have been utilized at job sites where Plaintiffs are claiming exposure, because information sought regarding other sales or distribution of Corhart's products is irrelevant and immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

Objection is also being made to these requests to the extent that they seek information or materials that have been gathered or prepared in the course of the asbestos litigation, or which are otherwise protected by the attorney/client privilege, the work product doctrine, or by any other applicable privilege. Corhart also objects to these requests to the extent that they seek confidential, trade secret, or other proprietary information or materials.

Corhart further makes the following additional General Objections to each of these Interrogatories and Request for Production: Corhart objects to these Interrogatories and Request for Production to the extent that they purport to require it to "identify" documents on the grounds that such requests to "identify" are overly broad, unduly burdensome and oppressive. Corhart objects to the definitions provided with these Interrogatories and Request for Production as being overly broad,

unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Corhart asserts that all terms should be given their usual and ordinary interpretation.

Corhart does not concede that any of its responses to these requests are or will be admissible evidence at trial of this action, and it does not waive any objection on any ground, whether or not asserted herein, to the use of any such response at trial.

These general objections and preliminary statement are explicitly incorporated into each of the responses hereinafter provided

INTERROGATORY NO. 1:

ANSWER:

These Interrogatory Answers were prepared based upon a search of presently existing records maintained in the ordinary business of this defendant and interviews with various employees of this defendant. No single officers, employee or agent of the company has the direct knowledge or the paper documents necessary to supply each and every answer required. All answers are derived from a number of sources, persons and documents. It is impossible to relate the preparation of any particular response to any particular person or document. The person signing the Answers or the Corporate Affidavit does so solely to satisfy whatever requirements may exist under the applicable rules of procedure. The person signing the Answers or the Corporate Affidavit does not, however, have direct knowledge regarding any specific answer, but is informed that the files, documents and interviews referred to above do support the responses based upon information available as of the date of signature.

INTERROGATORY NO. 1.1:

ANSWER:

Corhart objects to this Interrogatory on the ground that it is overly broad and unduly burdensome. Subject to and without waiving said objection, see Answer to Interrogatory No. 1.

INTERROGATORY NO. 2:

ANSWER:

- a. Corhart Refractories, division of Saint Gobain/Norton Industrial Ceramics Corporation.
- b. Corhart is a Delaware Corporation.
- c. 1600 W. Lee Street, Louisville, KY 40201
- d. Corhart objects to this interrogatory as vague and overbroad. Subject to and without waving said objection, investigation is continuing and Defendant reserves the right to supplement this response as discovery continues in this matter.
- e. Corhart objects to this interrogatory as vague and overbroad. Subject to and without

waving said objection, investigation is continuing and Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 3:

ANSWER:

Corhart objects to this Interrogatory on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence. Corhart further objects on the ground that it never had any subsidiary, predecessor or other form of business entity which engaged or involved in any manner in the manufacture, sale or distribution of asbestos-containing products. Subject to and without waiving said objections, Corhart refers to its preliminary statement.

INTERROGATORY NO. 4:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence. Corhart further objects on the ground that it never had any subsidiary, predecessor, or other form of business entity which engaged in the mining, selling, manufacturing, marketing, or distribution of asbestos containing products. Subject to and without waiving said objection, Corhart refers to its preliminary statement.

INTERROGATORY NO. 4.1

ANSWER:

See answer to Interrogatories No. 3 & No. 4.

INTERROGATORY NO. 5.

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states that it never engaged in the mining, manufacturing, marketing, installation or distribution of asbestos containing products. In a small number of cases, with the sale of certain types of refractory brick, and solely at the request of the customer, asbestos was adhered to the sides of the refractory brick or asbestos sheet was supplied for use with the refractory brick for use as expansion spacers in open hearth furnaces only. The asbestos sheets used to fulfill customer requests

were purchased from various asbestos manufacturers and suppliers. To the best of its knowledge, the only suppliers identified to date are Industry Suppliers of Louisville, Kentucky; Taylor-Siedenbach, Inc.; Coastal Rubber & Gasket Company; Queen Products Company; Louisville Insulating Company and Nicolet Industries. To the best of Corhart's knowledge, the asbestos expansion spacer material was provided beginning in 1957. The furnishing of the asbestos-containing expansion spacers was terminated when it was no longer specifically requested by Corhart's customers approximately mid 1970's. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 6:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving its objections, to the best of Defendant's knowledge, no.

INTERROGATORY NO. 7:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the grounds that it did not manufacture nor market an asbestos-containing product. Subject to and without waiving said objections, this Interrogatory is not applicable to Corhart.

INTERROGATORY NO. 8:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of Defendant's knowledge, no.

INTERROGATORY NO. 8.01:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, see answer to Interrogatory No. 5.

INTERROGATORY NO. 8.02:

ANSWER:

See answers to Interrogatories No. 5 and No. 8.01.

INTERROGATORY NO. 8.03:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objections, to the best of its knowledge, no.

INTERROGATORY NO. 8.04:

ANSWER:

N/A

INTERROGATORY NO. 8.05:

ANSWER:

Corhart objects to this Interrogatory as overly broad, unduly burdensome, and seeks information which is neither relevant to the subject matter of this case and not reasonably calculated to lead to the discovery of admissible evidence in that it seeks information about non-asbestos-containing products of Corhart. Furthermore, Corhart objects to this Interrogatory on the ground of vagueness and on the ground that it is virtually impossible to answer as written. Practically any product ever sold, distributed or used by Corhart might be construed to be within the scope of this Interrogatory. Based upon all of the foregoing objections, Corhart respectfully refuses to answer this Interrogatory.

INTERROGATORY NO. 8.06:

ANSWER:

See Answer to Interrogatory No. 5.

INTERROGATORY NO. 8.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it never manufactured or sold an asbestos-containing product. Subject to and without waiving its objection, Corhart states after reasonable investigation, to the best of its knowledge it does not have documents from which it can determine when, if ever, any of the facilities listed on Exhibit A which may have utilized Corhart products would have requested the inclusion of asbestos-containing expansion material with a purchase. Certain documents produced in response to Plaintiffs' Requests for Production of Documents No. 26 discuss the use of asbestos expansion materials in conjunction with Corhart products. However, there is no information in said documents indicating that Corhart was the supplier of the referenced asbestos materials. Defendant reserves the right to supplement this response as discovery in this matter continues.

INTERROGATORY NO. 8.2:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it never manufactured an asbestos-containing product. Subject to and without waiving its objection, Corhart states that it did not use other companies or businesses to market, distribute, install and/or sell any asbestos expansion spacers as listed in its response to Interrogatory No. 5. Defendant reserves the right to supplement this answer as discovery continues in this litigation.

INTERROGATORY NO. 8.3:

ANSWER:

See Answer to Interrogatory No. 8.2.

INTERROGATORY NO. 8.4:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states that sales summaries exist showing the sale of Corhart products to certain facilities listed on Exhibit A. However, the referenced sales summaries do not indicate the request for, or the inclusion of, any asbestos-containing products. Corhart refers plaintiffs to documentation relating to Corhart's sales produced in response to Plaintiffs' Requests for Production of Documents No. 2.

INTERROGATORY NO. 9.:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of its knowledge, Corhart has no records in its possession from which it can determine what, if any, individual or individuals may have had specific responsibility for contacting any of the facilities listed on Exhibit A. However, based upon its information and belief, Corhart believes that the following individuals may have contacted certain facilities listed on Exhibit A: A. Hess, T.C. Willis, J.M. Coons, W.R. Fields and N. Worden. Defendant reserves the right to supplement this answer as discovery continues in this litigation.

INTERROGATORY NO. 9.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it neither manufactured nor installed an asbestos-containing product. Subject to and without waiving its objection, Corhart states to the best of its knowledge, it did not have managers and/or sales personnel responsible for the sale or installation of asbestos-containing products. Defendant reserves the right to supplement this answer as discovery continues in this litigation.

INTERROGATORY NO. 10.

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, upon its information and belief, no.

INTERROGATORY NO. 11:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, upon its information and belief, no. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 12:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it did not manufacture an asbestos-containing product. Subject to and without waiving its objections, Corhart states that it began producing non-asbestos containing refractory products at its Louisville, Kentucky facility in 1927. Corhart also began operating facilities in Buckhannon, West Virginia in 1961, and Pascagoula, Mississippi in 1974 for non-asbestos containing refractory products. To the best of its knowledge, Defendant never manufactured asbestos containing expansion spacers which were supplied at no charge to customers at their request, to utilize with non-asbestos refractory brick on open hearth roofs or furnaces. Defendant reserves the right to supplement this response as discovery in this matter continues.

INTERROGATORY NO. 13:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case

nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of its knowledge, no.

INTERROGATORY NO. 13.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of its knowledge, no.

INTERROGATORY NO. 13.2:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects as this request is ambiguous and confusing as written. Corhart further objects to this Interrogatory on the grounds that it did not manufacture an asbestos-containing product. Subject to and without waiving its objection, Corhart states that to the best of its knowledge, it does not possess any packaging as referenced in this Interrogatory.

INTERROGATORY NO. 14:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it did not manufacture an asbestos-containing product. Corhart further objects to this Interrogatory as being irrelevant in that it seeks information regarding the design of and specifications for non-asbestos containing products. Subject to and without waiving its objections, Corhart states that it had no individuals responsible for the design or specification of asbestos-containing products.

INTERROGATORY NO. 15:

ANSWER:

See Answer to Interrogatory No. 5.

INTERROGATORY NO. 16:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it did not manufacture an asbestos-containing product. Subject to and without waiving its objection, Corhart states that to the best of its knowledge, it did not design or manufacture the asbestos-containing expansion spacer material occasionally requested by its customers, and, therefore, is not qualified to render an opinion regarding the generation of dust resulting from the application of such product.

INTERROGATORY NO. 17:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it did not manufacture an asbestos-containing product. Corhart further objects on the ground that this Interrogatory seeks information regarding products that did not contain asbestos. Subject to and without waiving its objection, Corhart states that it did not design or manufacture the asbestos-containing expansion material occasionally requested by its customers, and, therefore, is not in possession of documents relating to the design and preparation of said products.

INTERROGATORY NO. 18:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it did not manufacture nor design an asbestos-containing product. Subject to and without waiving its objection, Corhart states that it did not conduct such testing as referenced in this Interrogatory.

INTERROGATORY NO. 18.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it did not manufactured an asbestos-containing product. Corhart further objects to this Interrogatory as being irrelevant in that it seeks information regarding non-asbestos containing products which are not at issue in this action. Subject to and without waiving its objection, see Answer to No. 18.

INTERROGATORY NO. 19:

ANSWER:

See Answer to Interrogatory No. 18 and 18.1.

INTERROGATORY NO. 20:

ANSWER:

See Answers to Interrogatories No. 18 & No. 18.1

INTERROGATORY NO. 21:

ANSWER:

See Answer to Interrogatory No. 18. & No. 18.1

INTERROGATORY NO. 22:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states to the best of its knowledge, it conducted no such studies.

INTERROGATORY NO. 23:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states to the best of its knowledge, it conducted no such studies.

INTERROGATORY NO. 24:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects as it did not design or manufacture the asbestos-containing expansion spacer material occasionally requested by its customers, and relied upon the manufacturers of those products to provide a product that was reasonably safe for its intended use. Subject to and without waiving said objections, to the best of its knowledge, no such tests were conducted by Defendant as referenced in this Interrogatory.

INTERROGATORY NO. 25:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart cannot state precisely when it as a corporation, it first became aware of certain alleged potential health hazards associated with end users of asbestos insulation products. By way of further answer, Corhart believes that it became aware of this particular information when referenced in OSHA regulations in the late 1970s. To the best of its knowledge, Corhart never received any knowledge that was not available to the general public. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 26:

ANSWER:

See Answer to Interrogatory No. 25. By way of further answer, it is Corhart's understanding of the medical literature concerning any relationship between asbestos and lung cancer occurred later than the development of medical literature concerning the relationship between asbestos and asbestosis. Further, it is Corhart's understanding that the development of medical literature concerning any relationship between asbestos and mesothelioma occurred later than the development

of medical literature concerning the relationship between asbestos and lung cancer. Further, it is Corhart's understanding that there is no medical relationship between asbestos and cancer of the gastrointestinal tract, laryngeal cancer, renal cancer and lymphoma.

INTERROGATORY NO. 27:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of Corhart's knowledge, Corhart had never employed, retained or otherwise engaged any physician, industrial hygienist, or other such employee in connection with the specific activities referred to in this Interrogatory.

INTERROGATORY NO. 28:

ANSWER:

See Answer to Interrogatory No. 27.

INTERROGATORY NO. 29:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of Corhart's knowledge, Corhart had never employed, retained or otherwise engaged any medical officer, industrial hygienist or medical consultant in connection with the specific activities referred to in this Interrogatory. Corhart further states to the best of its knowledge, no such suggestions or recommendations as referred in this Interrogatory regarding asbestos was presented to Corhart.

INTERROGATORY NO. 30:

ANSWER:

Corhart objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter at issue nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objection, Corhart states as it understands this Interrogatory, it did not maintain an informal or formal library. Various employees of Corhart may have maintained books and periodicals pertaining to their specific area of responsibility. However, Corhart has no records from which it can determine the publications subscribed to by its employees during the referenced time-frame. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 30.1:

ANSWER:

See answers to Interrogatories No. 27 & 30.

INTERROGATORY NO. 30.2:

ANSWER:

Corhart objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome, seeks information which is neither relevant to the subject matter at issue nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objection, Corhart states that it has no records from which it can determine what, if any, individuals in its employ may have belonged to a specific trade or industry organization. Although Corhart has not located any supporting documents despite a reasonable search of its files, to the best of its knowledge, Corhart or Corhart employees may have been a member of the Industrial Hygiene Foundation, Air Hygiene Foundation, American Ceramic Society, Iron and Steel Institute, National Safety Council, and the Refractories Institute. Investigation is continuing and Defendant reserves the right to supplement this response.

INTERROGATORY NO. 31:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states to the best of its knowledge, no such testing as referenced in this Interrogatory was conducted.

INTERROGATORY NO. 32:

ANSWER:

See Answer to Interrogatory No. 31.

INTERROGATORY NO. 33:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objections, Corhart states it cannot state precisely if or when as a corporation it was advised or became aware by the American Conference of Governmental Industrial Hygienists of such, information as referenced in this Interrogatory.

INTERROGATORY NO. 33.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states to the best of its knowledge, no such testing as referenced in this Interrogatory was conducted.

INTERROGATORY NO. 34:

ANSWER:

Corhart objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter at issue nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objection, Corhart states as it understands this Interrogatory, it did not maintain an informal or formal library. Various employees of Corhart may have maintained books and periodicals pertaining to their specific area of responsibility. However, Corhart has no records from which it can determine the publications subscribed to by its employees during the referenced time-frame. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 35:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of Corhart's knowledge, no.

INTERROGATORY NO. 36:

ANSWER:

Corhart objects to this Interrogatory on the ground that it is vague, overly broad and not reasonably calculated to lead to the discovery of any admissible evidence. Corhart further objects on the ground that this Interrogatory fails to specify whose knowledge is deemed to be that of the company. It is not reasonably possible to determine when a company, such as Corhart, composed of many present and former employees, officers and representatives, may have learned of any specific facts. Subject to and without waiving its objections, Corhart states that it has no knowledge or information from which it can conclude that any of its personnel were aware of the publication referenced in this Interrogatory.

INTERROGATORY NO. 36.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of Corhart's knowledge, no.

INTERROGATORY NO. 36.2:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of Corhart's knowledge, no.

INTERROGATORY NO. 37:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case

nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to the vagueness of the terms "trade organization" and "trade association". Subject to and without waiving said objections, to the best of its knowledge, Corhart has never been a member of any asbestos trade association or organization as it understands the term. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 38:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to the vagueness of the terms "trade organization" and "trade association". Subject to and without waiving said objections, to the best of its knowledge, Corhart has never been a member of any asbestos trade association or organization as it understands the term. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 39:

ANSWER:

See Answer to Interrogatory no. 30.

INTERROGATORY NO. 40:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart lacks knowledge or information sufficient to allow it to respond to this Interrogatory.

INTERROGATORY NO. 41:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to

Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it neither manufactured nor sold an asbestos-containing product. Corhart further objects to this Interrogatory as being irrelevant in that it seeks information regarding products that are not at issue in this action. Subject to and without waiving said objections, Corhart states it did not manufacture products with or from asbestos and did not engage in the activities referenced in this Interrogatory.

INTERROGATORY NO. 42:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states that to the best of its knowledge, it did not prepare or distribute sales materials for the purpose of marketing or advertising asbestos-containing products.

INTERROGATORY NO. 43:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states to the best of its knowledge, it did not prepare any written materials indicating how asbestos-containing products should be used or maintained. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 44:

ANSWER:

Corhart objects to this Interrogatory on the ground that it is vague, overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of any admissible evidence. Virtually any written communications covering any subject area could be construed as being within the scope of this Interrogatory. Therefore, Corhart is unable to respond to this Interrogatory as written.

INTERROGATORY NO. 45:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects on the ground that this Interrogatory requires Corhart to render an opinion that, as a manufacturer of non-asbestos containing products, it is not qualified to make. Subject to and without waiving said objection, when discovery is completed, all proper and applicable contentions will be presented.

INTERROGATORY NO. 46:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, Corhart states it did not provide warnings regarding the use of asbestos-containing products because it was not in the business of manufacturing products with or from asbestos or asbestos components.

INTERROGATORY NO. 47:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of Corhart's knowledge, no. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 47.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects to this Interrogatory on the ground that it neither manufactured nor sold an asbestos-containing product. Therefore, this Interrogatory is not applicable to Corhart.

INTERROGATORY NO. 47.2:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, after reasonable investigation, Corhart lacks information or knowledge sufficient to allow it to respond to this Interrogatory.

INTERROGATORY NO. 47.3:

ANSWER:

Corhart objects to this Interrogatory on the ground that it is vague, overly broad and not reasonably calculated to lead to the discovery of any admissible evidence. Corhart further objects on the ground that this Interrogatory fails to specify whose knowledge is deemed to be that of the company. It is not reasonably possible to determine when a company, such as Corhart, composed of many present and former employees, officers and representatives may have learned of any specific facts. Subject to and without waiving its objections, Corhart states that it did not manufacture or produce an asbestos-containing product. Therefore, it did not engage in the activities referenced in this Interrogatory.

INTERROGATORY NO. 47.4:

ANSWER:

See Answer to Interrogatory No. 47.3.

INTERROGATORY NO. 48:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of its knowledge, no.

INTERROGATORY NO. 48.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to

Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of its knowledge, Corhart states there existed an informal document retention policy, in which records were generally retained for approximately five (5) years. Investigation in this matter is continuing and Defendant reserves the right to supplement this response.

INTERROGATORY NO. 48.2:

ANSWER:

See answer to Interrogatory No. 48.1

INTERROGATORY NO. 48.3:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of its knowledge, no document index exists. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 48.4:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of its knowledge, no document index exists. Defendant reserves the right to supplement this response as discovery continues in this matter.

INTERROGATORY NO. 49:

ANSWER:

Corhart objects to this Interrogatory as it is vague, and objects to the extent it requests information subject to the attorney client privilege work product doctrine or any other applicable privilege. Subject to and without waiving said objection, to the best of Defendant's knowledge, no.

INTERROGATORY NO. 50:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, when discovery is completed, all proper and applicable contentions will be presented.

INTERROGATORY NO. 51:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, when discovery is completed, all proper and applicable contentions will be presented.

INTERROGATORY NO. 52:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Corhart further objects on the ground that this Interrogatory requires Corhart to render an opinion that, as a manufacturer of non-asbestos containing products, it is not qualified to make. Subject to and without waiving said objection, when discovery is completed, all proper and applicable contentions will be presented.

INTERROGATORY NO. 53:

ANSWER:

Corhart will provide any and all required information concerning expert witnesses in accordance with the applicable time period prescribed by the Court which is part of the Case Management Order governing these cases.

INTERROGATORY NO. 54:

ANSWER:

See Answer to Interrogatory No. 53.

INTERROGATORY NO. 55:

ANSWER:

Yes.

INTERROGATORY NO. 55.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, when discovery is completed, all proper and applicable contentions will be presented. By way of further answer, see Defendant's answer to Plaintiff's Complaint.

INTERROGATORY NO. 56:

ANSWER:

This defendant is unable to answer due to lack of information regarding dates of alleged exposure. However, without waiving this objection, defendant refers plaintiffs to the attached Schedule of Insurance which relates to policies of coverage for various insurance companies. This defendant does not represent that it in any way represents an admission or agreement by any insurer that its policies provide coverage for asbestos-related claims against Corhart Refractories or that all of the listed policies are confirmed.

INTERROGATORY NO. 56.1:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. Subject to and without waiving said objection, to the best of its knowledge, no.

INTERROGATORY NO. 57:

ANSWER:

Corhart will provide any and all required information concerning fact witnesses in accordance with the applicable time period prescribed by the Court which is part of the Case Management Order

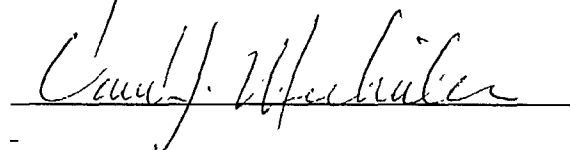
governing these cases.

INTERROGATORY NO. 58:

ANSWER:

Corhart objects to this Interrogatory request on the grounds that it is vague, overly broad, unduly burdensome and seeks information which is neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence in that it is not limited to Plaintiff's jobsites and time periods of alleged exposure. By way of further answer, see answers to Interrogatory 5

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Virginia Heidloff", is written over a horizontal line.

Of Counsel:

**GALLAGHER, SHARP, FULTON
FULTON & NORMAN Of Counsel:**

**VIRGINIA HEIDLOFF (0014348)
JOSEPH W. PAPPALARDO (0014326)
DANIEL J. MICHALEC (0042733)**

SCHEDULE OF INSURANCE¹
CORHART REFRACTORIES CORPORATION

EFFECTIVE YEARS	COMPANY	LIMITS	TYPE OF POLICY	EXCESS	POLICY NUMBER
1/1/71 - 1/1/72	The Home Indemnity Co.	\$100/\$300/\$1M B.I.	General Liability Primary		GA9944686
1/1/70 - 1/1/71	The Home Indemnity Co.	\$100/\$300/\$1M B.I.	General Liability Primary		GA9853000
1/1/69 - 1/1/70	The Home Indemnity Co.	\$100/\$300/\$1M B.I.	General Liability Primary		GA9993948A61
4/1/76 - 4/1/77	Lumbermens Mutual Casualty	\$300/Occurrence \$1M/Aggregate B.I.	General Liability Primary		62L576200
4/1/75 - 4/1/76	Lumbermens Mutual Casualty	\$300/Occurrence \$1M/Aggregate B.I.	General Liability Primary		52L576200
4/1/74 - 4/1/75	Lumbermens Mutual Casualty	\$300/Occurrence \$1M/Aggregate B.I.	General Liability Primary		42L576200
4/1/73 - 4/1/74	Lumbermens Mutual Casualty	\$300/Occurrence \$1M Aggregate B.I.	General Liability Primary		32L576200
1/1/72 - 4/1/73	Lumbermens Mutual Casualty	\$100/\$300/\$1M B.I.	General Liability Primary		22L576200

Ind. #56

EFFECTIVE YEARS	COMPANY	LIMITS	TYPE OF POLICY	EXCESS	POLICY NUMBER
1/1/67 - 1/1/68	INA	\$100/\$300/\$1M. B.I.	General Liability		Renewal of LB-29150-380083-0 Part of Policy No. ALB-39787
1/1/63 - 1/1/64	INA	\$100/\$300/\$1M B.I.	General Liability		New Line-380083-0 Part of Blanket Pol. No. LB-29150
1/1/68 - 1/1/69	INA	\$100/\$300/\$1M B.I.	General Liability		ALB-39787
1/1/64 - 1/1/65	INA	\$100/\$300/\$1M B.I.	General Liability		LB-29150
1/1/65 - 1/1/66	INA	\$100/\$300/\$1M B.I.	General Liability		LB-29150
1/1/66 - 1/1/67	INA	\$100/\$300/\$1M B.I.	General Liability		LB-29150
1/1/60 - 1/1/63 with renewal endorse- ment.	INA	\$25M/PP/\$50M Accident/ Aggregate B.I.	General Liability		9CGL 122543
Renewal Endorsement 1/1/62 - 1/1/63	INA				Forms part of Policy No. 9CGL 122543

Corhart Refractories has deductibles with respect to the following Lumbermens policies:

POLICY PERIOD	POLICY NUMBER	AGGREGATE DEDUCTIBLE LIMITS	CUMULATIVE AGGREGATE DEDUCTIBLE LIMITS
4/1/74 - 4/1/75	42L-576200	\$900K	\$900K
4/1/75 - 4/1/76	52L-576200	\$1.5M	\$2.4M
1/1/72 - 1/1/73	22L-576200 32L-576200	\$500K	\$500
1/1/73 - 4/1/73	22L-576200 32L-576200	\$125K	\$625K
4/1/73 - 4/1/74	22L-576200 32L-576200	\$600K	\$1,225M

**SCHEDULE OF EXCESS INSURANCE
CORHART REFRACTORIES CORPORATION**

EFFECTIVE YEARS	COMPANY	LIMITS	TYPE OF POLICY	POLICY NUMBER
2/1/62 - 2/1/65	Lloyd's	1MM - any one Occurrence and Annual Aggregate	Excess Umbrella Liability Excess - Primary 30.099% part of 100% of limits	POL. NO. 61576
2/1/62 - 2/1/65	Lloyd's	4MM any one Occurrence and Annual Aggregate	Excess Umbrella Liability 16.44% of part of 100% of limits	POL. NO. 61577
7/2/63 - 7/2/66	Lloyd's	\$5MM XS \$5MM	Excess Liability Primary	POL. NO. 64249
2/1/65 - 2/1/68	The Home Insurance Co.	\$10MM XS \$10MM	Excess Liability	POL. NO. HEC 9544023
5/4/67 - 5/4/70	CNA Continental Casualty	\$10MM XS \$10MM	Excess Liability	POL. NO. 9140402
2/1/68 - 2/1/71	The Home Insurance Co.	\$10MM XS \$10MM	Excess Liability	POL. NO. HEC 9559388
4/4/70 - 4/4/73	American Home Assurance Co.	\$10MM XS \$10MM	Excess Liability	POL. NO. CE357160
2/1/71 - 2/1/74	The Home Insurance Co.	\$5MM XS \$10MM	Excess Liability (as provided in excess of 10MM Umbrella Liability - Home Insurance Co. Pol. HEC 9793492)	POL. NO. HEC 9919679
2/1/71 - 2/1/74	The Home Insurance Co.	\$10MM XS P Occurrence Aggregate	Excess Liability	POL. NO. HEC 9793492
2/1/74 - 2/1/77	American Home Assurance Co.	\$15MM XS \$10MM	Excess Liability	POL. NO. CE3436779

EFFECTIVE YEARS	COMPANY	LIMITS	TYPE OF POLICY	POLICY NUMBER
2/1/74 - 2/1/77	American Home Assurance Co.	\$15MM XS \$10MM	Excess Liability	POL. NO. CE3437412
4/29/74 - 2/1/77	Firemans Fund	\$10MM of \$25 XS \$75MM	Excess Liability	XLX 1202692
3/15/74 - 2/1/77	The North River Insurance Co.	\$25MM XS \$50MM	Excess Liability	NO. XS3542
4/29/74 - 2/1/77	Chubb & Son, Inc.	(Not to exceed the greater of): 20% of Loss in excess of Underlying insurance <u>not</u> for more than \$5MM per Occurrence <u>or</u> \$5MM Aggregate (Home-1st Underlying Ins. \$10MM; other Underlying Ins. \$65M-excess of \$10M)	Excess Liability	NO. 79221594
2/1/74 - 2/1/77	Home Insurance Co.	\$10MM XS P	Excess Liability	HEC 4764156
5/25/73 - 5/25/76	The Aetna Casualty and Surety Co.	\$25MM Max Occurrence \$25MM Max Annual Aggregate	Excess Overlayer Indemnity	NO. 01 XN 421 WCA

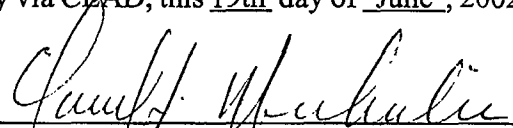
EFFECTIVE YEARS	COMPANY	LIMITS	TYPE OF POLICY	POLICY NUMBER
4/29/74 - 2/1/77	INA	\$5MM-part of \$25MM- Excess of Primary and \$75MM - Intervening Excess	Excess	Part of Certificate of Excess Insurance NO. XCP-3965
4/29/74 - 2/1/77	Great American Insurance Company	\$5MM Occurrence \$25MM Annual Aggregate	Certificate of Excess Insurance	PRO 7009892

CERTIFICATE OF SERVICE

The original of the foregoing was sent via regular U.S. mail, postage pre-paid, to Counsel for Plaintiffs, Ladd R. Gibke, BARON & BUDD, P.C., 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219, with a Notice of Filing filed electronically via CLAD, this 19th day of June, 2002.

Of Counsel:

**GALLAGHER, SHARP, FULTON
FULTON & NORMAN**


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