

PLAINTIFF'S
EXHIBIT

DOW-129

NO. 81-G-1331

BARBARA MEYER

VS.

JOHNS-MANVILLE SALES
CORP., ET AL.

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IN THE DISTRICT COURT OF
BRAZORIA COUNTY, TEXAS
239TH JUDICIAL DISTRICT

ANSWERS TO INTERROGATORIES

TO: The Dow Chemical Company, by and through its attorney of record, Mr. Andrew S. Hanen, Andrews & Kurth, 4200 Texas Commerce Tower, Houston, Texas 77002

COMES NOW Raymark Industries, Inc., Defendant, and files the following Answers to Dow Chemical Company's Interrogatories.

Respectfully submitted,

BUTLER & BINION

By

Jeffrey B. McClure
Jeffrey B. McClure
State Bar No. 13428200
Allied Bank Plaza
Houston, Texas 77002
(713) 237-2016

ATTORNEYS FOR DEFENDANT,
RAYMARK INDUSTRIES, INC.

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Answers to Interrogatories has been forwarded by certified mail, return receipt requested, to Mr. Andrew S. Hanen, Andrews & Kurth, 4200 Texas Commerce Tower, Houston, Texas 77002 and to all other counsel of record by regular mail on this the _____ day of December, 1983.

Jeffrey B. McClure
Jeffrey B. McClure

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ANSWERS TO INTERROGATORIES

1. Please give your exact legal name, place of incorporation, and state whether or not you are licensed to do business in the State of Texas.

Answer: See Rider A.

2. Has this defendant been sued under its correct name? If not, state the correct legal name of the defendant and provide the information requested in number one above concerning the defendant as correctly named.

Answer: See answer to interrogatory No. 1.

3. Did this defendant, between the years 1940 and 1980, manufacture or sell asbestos containing products?

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and because it is unduly burdensome and oppressive. Without waiving the foregoing objections and subject thereto, Raymark states that it has, from time to time, between the years 1940-1980, manufactured and sold asbestos containing products.

4. Give the name and trade name of all types of asbestos containing materials manufactured or sold by you, giving the dates that you began to manufacture or sell each such material listed, and the date you ceased manufacturing or selling such items, if production has ceased.

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and because it is unduly burdensome and oppressive. In addition, see Rider B.

5. Give a description of the materials in Interrogatory no. 3, including the asbestos content.

Answer: See answer to interrogatory No. 4.

6. When was your company first aware that asbestosis mesothelioma, or any other lung disease could occur among workers who were exposed to the inhalation of asbestos fibers from products manufactured or sold by you?

Answer: Raymark objects to this Interrogatory because it is overly broad in that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and it is vague and ambiguous in that it fails to specify a particular, relevant product, location, condition of exposure or time period. Without waiving the foregoing objections and subject thereto, Raymark is aware that some members of the medical community believe that there is a relationship between exposure to asbestos and an increased risk of mesothelioma. The first epidemiological study dealing with the issue was authored by Dr. J. C. Wagner and others in 1960 in South Africa, entitled, "Diffuse Pleural Mesothelioma and Asbestos Exposure in the Northern

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Western Cape Province," 17 Brit. J. of Ind. Med. 260. Raymark became aware of this study sometime after its publication, though the exact date is unknown. In addition, Raymark is aware of a body of medical opinion that chrysotile asbestos fiber is less likely to be associated with mesothelioma than other types of asbestos fiber. This theory is premised on the physical characteristics of chrysotile fibers which make them much less likely to cause respiratory ailments. Further, Raymark is aware that in a large number of mesothelioma cases, occupational histories fail to reflect any known asbestos exposure. Zeolites and ethylene oxide are suspected by some to be causes of mesothelioma.

7. State the date you first attached a warning of any possible adverse health consequences caused by the inhalation of asbestos fibers to products sold or manufactured by you that contained asbestos, and either attach a copy of that warning, or state the content of said warning verbatim.

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections and subject thereto, see Rider C.

8. List all warnings of any possible adverse health consequences caused by the inhalation of asbestos fibers ever given on any product manufactured or sold by you which contained asbestos, and the date which said warnings first appeared. Either attach a copy of the warnings or state the content of them verbatim.

Answer: See answer to interrogatory no. 7.

9. Is it possible for a layman to distinguish your asbestos containing products from those manufactured or distributed by your competitors when such products have been removed from their container or containers? If your answer is yes, please describe how you content your product can be distinguished from those of a competitor.

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections and subject thereto, see Rider D.

10. Did each of your products or materials, which contained asbestos, generally reach, or were packaged to reach, the consumer, insulation helper, insulation mechanic, or ultimate user, without substantial change in the condition in which it was sold?

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections and subject thereto, see Rider E.

11. If your answer to the above interrogatory is no, with respect to each such product, explain in what way the defendant claims its products were altered or substantially changed after sale or distribution, and before reaching the ultimate user.

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Answer: See answer to interrogatory No. 10.

12. Has the defendant ever acquired another corporation, company, or business, which manufactured, sold, processed, distributed, or contracted to apply insulation products containing asbestos? If the answer to the above interrogatory is yes, then state the following concerning such predecessor:

- a. Full and correct name.
- b. Principal place of business.
- c. State of incorporation.
- d. Date of acquisition.
- e. Was this business authorized to transact business in the State of Texas?

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections and subject thereto, see Rider F.

13. Did your company ever product sales literature or other-printed material which advised workers of the hazards of asbestos dust, and recommend ways of handling your materials that would reduce or eliminate the creation of asbestos dust? If so, state verbatim what the literature says and the date in which each instruction or recommendation was put on your literature, also please attach copies of all such literature.

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections and subject thereto, see answer to interrogatory No. 7.

14. Does your company have, or has it ever had, a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contracting business.

Answer: No.

15. Has your company, or its predecessor, ever conducted any studies concerning the effects of the inhalation of asbestos dust fibers on one using or being exposed to any of the asbestos materials manufactured, sold, or distributed by you. If your answer is yes, give the date and nature of such studies, the name of the persons conducting such studies, the purpose of the study(s), the result of such studies and attach a copy of any report based upon studies.

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections and subject thereto, see Rider G.

16. Please list all of the products containing asbestos, the amount of each product and the date of each sale, sold by you or any subsidiary or predecessor to Dow Chemical Company.

Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and because it is unduly burdensome and oppressive. Without waiving these objections and subject thereto, to the extent documents exist which may be responsive to this interrogatory, they are contained in a document depository located at the offices of Pitney, Hardin, Kipp & Szuch, 163 Madison Avenue, Morristown, New Jersey. Gathered from Raymark's facilities around the country, these documents are maintained in the same manner and order as they were discovered. The burden of deriving the information contained in these documents is substantially the same for plaintiff as for Raymark. Accordingly, upon reasonable notice, plaintiff's counsel may review any non-privileged documents at the document depository in Morristown, New Jersey during normal business hours.

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17. For every product listed above, state the first date a warning of any possible adverse health consequences caused by the inhalation of asbestos fibers appeared on said products, and state the content of said warning verbatim, or attach a copy.

Answer: See answer to interrogatory No. 16.

18. Have you or any of your employees, agents or subsidiaries ever contacted Dow as to the means, methods and precautions to take in installing, or safely removing, or safely maintaining any of the asbestos containing products which you have manufactured or sold? If yes, please state the date of each contact, the means used, the person(s) from your company that were involved, and the names of any personnel from Dow that were involved.

Answer: See answer to interrogatory No. 16.

19. Does defendant expect to call expert witnesses at the trial of this case? If yes, state the name and address of each expert and the testimony expected to be given by each expert.

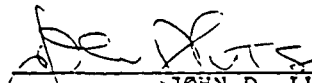
Answer: Raymark objects to this interrogatory because it is overly broad and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections and subject thereto, see Rider G.

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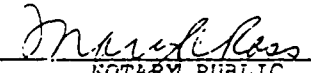
STATE OF CONNECTICUT) VERIFICATION
SS.:
COUNTY OF FAIRFIELD)

JOHN D. LUTSI, being duly sworn, according to law, upon his oath, deposes and says: I am Controller and Assistant Secretary of Raymark Industries, Inc. and am authorized to make this verification on its behalf; I have read the foregoing Answers to Interrogatories and know their contents; the facts stated therein are not within my personal knowledge, the facts have been assembled by authorized employees of Raymark Industries, Inc. and I am informed and believe and, based upon such information and belief, declare that the facts stated therein are true.



JOHN D. LUTSI

Sworn and subscribed to
before me this 24th day
of October, 1983.



NOTARY PUBLIC
My Commission Expires April 1, 1987.

Heyer

RIDER A

ANSWER TO INTERROGATORY NO. 1

On June 28, 1982, Raymark Industries, Inc., a wholly-owned subsidiary of Raymark Corporation, merged with and acquired the assets of Raybestos-Manhattan, Inc. Raybestos-Manhattan, Inc., was incorporated on July 5, 1929 for the purpose of merging The Raybestos Company, Bridgeport, Connecticut; General Asbestos and Rubber Company, Charleston, South Carolina (then a subsidiary of the Raybestos Company); the Manhattan Rubber Manufacturing Co., Passaic, New Jersey; and United States Asbestos Company, Manheim, Pennsylvania. Both Raymark Industries, Inc. and Raymark Corporation are Connecticut corporations and were incorporated on April 30, 1982 and June 17, 1981 respectively; their corporate charters are a matter of public record and copies of the same can be obtained from the Secretary of the State of Connecticut upon request. Their corporate headquarters are now located at 100 Oakview Drive, Trumbull, Connecticut.

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RAYMARK TEXTILE PRODUCTS AND TRADE NAMESI. Chrysotile Products

<u>Product</u>	<u>Approx. Date First Sold</u>	<u>Approx. Max. Asbestos %</u>	<u>Appearances</u>	<u>Intended Use</u>
Lap*	1935	100	Convolute coiled felt	Electrical insulation
Roving	1929	95	Untwisted thread	Raw material for textiles
Cable filler	1938	100	Twisted thread	Electrical cable insulation
Glassbestos	1940	80	Twisted thread	" "
Yarn	1929	95	" "	Raw material for
Novatex	1972	100	" "	textiles and sewing
Sealsafe	1975	80	" "	thread for lagging and heat resistant fabrication
Rope*	1929	90	Twisted Rope	Sealing material
Wick*	1929	90	Loosely twisted	" "
Cloth	1929	95	Woven fabric	Miscellaneous heat and flame resistant
Glassbestos	1940	80	" "	applications such as welding cur- tains, fire checks,
Rhinobestos	1946	90	" "	lagging cloth, lamine reinforcing, etc.
Polybestos*	1955	85	" "	
Silvabestos	1959	75	" "	
Novatex	1967	100	" "	
Speedlag*	1969	65	Adhesive coated woven fabric	Pipe lagging

<u>Product</u>	<u>Approx. Date First Sold</u>	<u>Approx. Max. Asbestos %</u>	<u>Appearances</u>	<u>Intended Use</u>
Eleven Thirty-three	1971	90	Woven fabric	Miscellaneous
Tribestos*	1971	90	Woven fabric	Safety clothing
Sealsafe	1975	80	Treated cloth	Safety clothing
Goldbestos*	1959	70	Coated cloth	Ironing board covers
Novabestos*	1947	95	Woven Cloth	Miscellaneous
Flurobestos	1955	75	Fluorocarbon	Chemical resistant coated cloth
Terrybestos*	1957	80	Tufted cloth	Gloves
Felts	1938	100	Paper coil or roll	Electrical insulation and/or laminate reinforcement
Tape	1929	85	Convolute coil	
Gatortape	1963	80	" "	
Glassbestos	1942	80	" "	
Sealsafe	1975	80	" "	Electrical
Novatex	1970	100	" "	and/or thermal
Pyrotex	1938	60	" "	insulation and/or
Allbestos*	1941	80	" "	fire resistance
Novabestos*	1947	85	" "	
Tubing	1929	100		Filtering and protective covering
Novatex	1973	100		for pipes and
Sealsafe	1975	80		tubing

*Discontinued products:

Novabestos - 1964
 Terrybestos - 1960
 Goldbestos - 1970
 Speedlag - 1976

Polybestos - 1979
 Tribestos - 1979
 Lap - 1981
 Rope, Wick - 1981
 Allbestos - 1981

<u>Product</u>	<u>Approx. Date First Sold</u>	<u>Approx. Max. Asbestos %</u>	<u>Appearances</u>	<u>Intended Use</u>
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II. Crocidolite Products

Packings*	1929	—	Coiled or twisted rope	Mechanical applications
Valve Rings*	1950's	—	Untwisted Thread	Mechanical applications

*Discontinued products:

Packings - 1972
Valve rings - early 1970's

III. Amosite Products

Blankets*	1929	100	Woven blanket	Electrical and/or thermal insulation for U.S. Navy
Tape*	1940	—	Convolute coil	Electrical and/or thermal insulation

*Discontinued products:

Blankets - 1944
Tape - 1970

IV. Anthophyllite Products

Paper	1958	100	Compressed threads	Automatic transmission applications
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RIDER C

ANSWER TO INTERROGATORY NO. 7

No such notice was deemed necessary because exposure to airborne fiber levels generated by the installation of Raymark products furnished for use by insulation mechanics are below those limits at which health effects are known to occur and below limits recommended by industrial hygiene authorities. Raymark's asbestos products furnished for use by insulation mechanics were basically textile in nature, composed of relatively long textile grade asbestos fibers that does not readily become airborne during normal use, fabrication and/or handling in the environment of industrial insulation mechanics. Raymark does not believe these materials presented health hazards to mechanics who used them in the course of their work.

However, beginning in July 1972, in an attempt to further insure against misuse of its products, Raymark placed caution labels on products where asbestos fibers were not encapsulated. This was done in accordance with the OSHA standard, effective in June 1972. Beginning in 1974, cautions were placed on all asbestos products furnished by Raymark stating, in accordance with OSHA requirements: CAUTION. CONTAINS ASBESTOS FIBERS. AVOID CREATING DUST. BREATHING DUST MAY CAUSE SERIOUS BODILY HARM. The caution label has been on each package of each shipment from Raymark plants since the date that the warnings first were used.

The cautions were placed on products by means of ink, stencil, pressure sensitive adhesive label, preprinted adhesive tape, preprinted packaging or wrapping material and printed paper tags. These cautions are in regular use at each shipping location that handles asbestos-containing products.

In addition, since sometime in 1975, Raymark distributed a booklet entitled "Recommended Work Practices, Use and Handling of Asbestos Textile Products" to customers of textile products. Since mid-1975, Raymark has distributed an asbestos "information list" to many of its customers and other interested parties. This list contains recommended work practices and information on monitoring services and protective equipment, among other things.

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In addition to caution labels on packages, printed work practice instructions have been included in all shipments of asbestos-containing friction materials since in or about mid-1975. These instructions read as follows:

IMPORTANT
ASBESTOS DUST HAZARD

- Do not breathe dust
- Do not use air hoses for cleaning
- Do not machine without dust collection equipment
- Do use vacuum or wet cleaning methods.
- Do dispose of dust in sealed container
- Do wear mask if unable to avoid dust

Customers have been apprised of the need for precautions against airborne asbestos dust hazards by means of printed bulletins from time to time since approximately January 1975.

Early in 1977 Raymark distributed an "Environmental Package" to its asbestos textile customers. This package contained a copy of the aforementioned booklet, along with an up to date copy of the OSHA asbestos regulation, a summary of the results of certain laboratory tests of fiber release from asbestos fabrics conducted at McGill University, a list of suppliers of protective equipment, a list of laboratories and consultants offering asbestos dust monitoring services and a list of suppliers of vacuum cleaners and sources of information on design and control of local exhaust systems. The "Environmental Package" was assembled by John E. Day, Jr., Director of Environmental Programs at Raymark's former plant in North Charleston, S.C.

Beginning in or about October 1977, Raymark provided the following notice on those of its asbestos textile products which, despite being treated with a dust-suppressing binder, to fully encapsulate the asbestos fibers, might release airborne fiber levels in excess of OSHA limits if subjected to significant abuse:

NOTICE

This asbestos product is manufactured with a dust-suppressing binder for the express purpose of locking-in fibers during normal use. Care should be used while handling all asbestos products so as to avoid abuse and excessive dust emission. For detailed information, consult the handbook "Recommended Work Practices - Use and Handling of Asbestos Textile Products," published by the Asbestos Information Association. A copy will be sent to you upon request.

Write to: Textile Group
R/M Industrial Products Company
P.O. Box 5205
North Charleston, S.C. 29406

The work practice instruction sheets were authorized by John E. Marsh, Director of Environmental and Government Affairs, Raymark Industries, Inc., 100 Oakview Drive, Trumbull, CT. The booklet entitled "Recommended Work Practices - Use and Handling of Asbestos Textile Products" was obtained from the Asbestos Information Association.

The caution labels are attached directly to the outside of asbestos products packages prior to shipment from Raymark plants. Work practice sheets are inserted inside friction materials containers prior to shipment. AIA booklets have been distributed by hand and by mail, and to the best of Raymark's knowledge no record has been kept of these distributions. The "Environmental Package" was circulated by mail to asbestos textile customers.

Aside from the aforementioned booklets, Raymark did not provide its customers with any special instructions. Raymark as a rule does not furnish application or installation instructions with products sold for use by insulation mechanics. Procedures for the use of these materials are believed to be so old and well-known as to constitute state of the art technique and are not published or disseminated by Raymark.

RIDER DANSWER TO INTERROGATORY NO. 9

Many other companies supply asbestos textile material similar to those manufactured by Raymark over the years. Once such products are removed from their wrappings, it is virtually impossible to distinguish with certainty between one manufacturer's asbestos textile product and another's. Expert examination of certain textile products may occasionally permit the examiner to eliminate some manufacturers as potential sources of the product; even in such instances, however, it may not be possible to identify the actual producer of the product.

RIDER EANSWER TO INTERROGATORY NO. 10

Raymark's asbestos textile products were shipped by truck to specific destinations. For many years, cloth products were wound on cardboard cores and wrapped in burlap. Starting in approximately 1973, the outer wrapping was polyethylene film instead of burlap. Tape products were wound in rolls and packed in cardboard cartons with Raybestos-Manhattan printed on the cartons. Starting in approximately December 1978, tape was furnished in individual packages covered with heat-shrunk polyethylene film. A number of packages were placed in cardboard cartons for shipment.

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RIDER F

ANSWER TO INTERROGATORY NO. 12

Raymark Industries, Inc., a wholly-owned subsidiary of Raymark Corporation, was merged with Raybestos-Manhattan, Inc. on June 28, 1982. Raymark Industries, Inc. and Raymark Corporation were incorporated under Connecticut law on April 30, 1982 and June 17, 1981, respectively. Their corporate charters are a matter of public record and copies of the same can be obtained from the Secretary of the State of Connecticut upon request. Their corporate headquarters are located at 100 Oakview Drive, Trumbull, Connecticut.

Raybestos-Manhattan, Inc. was incorporated on July 5, 1929 for the purpose of merging The Raybestos Company, Bridgeport, Connecticut; General Asbestos and Rubber Company, Charleston, South Carolina (then a subsidiary of the Raybestos Company); The Manhattan Rubber Manufacturing Company, Passaic, New Jersey; and United States Asbestos Company, Manheim, Pennsylvania. Raybestos-Manhattan, Inc. was reincorporated on February 25, 1976 under Connecticut laws and remained in existence until its merger into Raymark Industries, Inc.

Of the entities merged into Raybestos-Manhattan, Inc., the Manhattan Rubber Manufacturing Company was by far the largest. The Manhattan Rubber Manufacturing Company was incorporated on October 23, 1893. Prior to 1924, that company made a folded and stitched brake lining that was marketed under the CARDINAL brand name. It consisted of two layers of red rubberized asbestos cloth and a back-up layer of cotton duck. The product was manufactured in its belting department.

The Raybestos Company was founded on October 14, 1916. The immediate predecessor of The Raybestos Company was the Royal Equipment Company of Bridgeport, Connecticut, which was founded in December of 1909. The predecessor of Royal Equipment Company was the A. H. Raymond Company which was founded in January of 1902.

General Asbestos and Rubber Company was founded on

interest in General Asbestos and Rubber Company in order to assure a continuing supply of asbestos yarn for its brake lining looms. The Raybestos Company acquired complete control of General Asbestos and Rubber Company in April of 1924. Therefore, in that year, General Asbestos and Rubber Company became a subsidiary of The Raybestos Company.

The United States Asbestos Company was incorporated on August 24, 1906. It was founded in Manheim, Pennsylvania, by eight local businessmen who constituted the Board of Directors. The United States Asbestos Company was a major supplier of asbestos cloth to The Manhattan Rubber Manufacturing Company and a major supplier of asbestos yarn to The Raybestos Company. It was the long-established buyer-seller relationship between all of these entities which prompted the formation of the corporation, Raybestos-Manhattan, Inc.

Both United States Asbestos Company and General Asbestos and Rubber Company produced a complete line of asbestos packings in 1929. The Manhattan Rubber Manufacturing Company made many styles of rubber packings. The eventual consolidation of these three lines was another reason for the merger of the four aforementioned companies.

Within a year after the formation of Raybestos-Manhattan, Inc. the corporation initiated an International Operations Division located in New York City. In 1969, that division was moved to Bridgeport, Connecticut and in 1974 it was moved to Trumbull, Connecticut. Today the international operations within Raymark Industries, Inc. has manufacturing plants in Radevormwald, West Germany; Dandenong, Australia; Hokkaido, Japan; and Mexico. This division sells products to overseas markets throughout the world.

In December of 1968, Raybestos-Manhattan acquired Spartan Abrasive Co., Morgan, Pennsylvania, as a wholly owned subsidiary for 23,800 shares of stock. That company manufactured abrasive wheels. It was sold in 1973.

On August 1, 1969, the Milford Rivet Machine Company, Milford, Connecticut, with five plants in the United States was acquired by Raybestos-Manhattan. In 1971, Milford Rivet & Machine Company acquired Farrell Products Company, Costa Mesa, California in order to expand operations in the fastener industry.

Milford Rivet & Machine Company acquired Farrell Products Company, Costa Mesa, California in order to expand operations in the fastener industry.

On May 1, 1981, Raybestos-Manhattan, Inc. acquired AVC Corporation, a manufacturer of metal fasteners, precision-formed parts for industrial applications and upholstery fabrics. The purpose for that acquisition was to improve the company's position in the fastener and precision parts industries.

As of June 28, 1982, the date of its merger into Raymark Industries, Raybestos-Manhattan sold its asbestos textile manufacturing facility in North Charleston, South Carolina to R/M Industrial Products Company, a company wholly separate from and unrelated to Raymark Industries, Inc. and Raymark Corporation.

The executive heads of the four entities which joined together to form Raybestos-Manhattan, Inc. in 1929 were the initial executives of the new corporation. The original slate of officers consisted of: Arthur Farragut Townsend, formerly of Manhattan Rubber Manufacturing Company, became Chairman of the Board of Directors; Sumner S. Simpson, formerly of The Raybestos Company, became President; Henderson M. Green, formerly of Manhattan Rubber Manufacturing Company, George R. Weber, formerly of United States Asbestos Company, and S. R. Zimmerman, formerly of the United States Asbestos Company, became Vice Presidents; Morton F. Judd, formerly of The Raybestos Company became Secretary; Fred L. Curtis, formerly of The Manhattan Rubber Manufacturing Company became Treasurer; and William H. Dunn, formerly of The Manhattan Rubber Manufacturing Company became Assistant Treasurer.

Sumner Simpson was President of Raybestos-Manhattan from 1929-1948. His successor was John F.D. Rohrbach, who was President from 1948-1967. William S. Simpson served as President from 1967-1974. Robert M. Gordon served as President and Chief Operating Officer of Raybestos-Manhattan from 1974 until 1979. Frederick J. Ross became President and Chief Executive Officer in December, 1979, and continues in that capacity for Raymark Industries, Inc.

Arthur Farragut Townsend remained Chairman of the Board of Directors of Raybestos until his death in 1940. The position remained unfilled until 1948 when Sumner Simpson became Chairman of the Board. Mr. Simpson remained Chairman until his death in 1953. Again the position remained unfilled until 1967 when

John F.D. Rohrbach became Chairman of the Board. In 1968, William S. Simpson became Chairman and remained such until April 1970. At that time, S. R. Zimmerman, Jr. became Chairman and held that position until December 31, 1970, when William S. Simpson resumed the Chairmanship and continued in that position until the June, 1982 merger of Raybestos-Manhattan, Inc. into Raymark Industries, Inc. The Chairman of the Board of Raymark Industries, Inc. is Frederick Ross. William Simpson serves as Vice-Chairman of the Board for Raymark Industries, Inc.

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RIDER GANSWER TO INTERROGATORY NO. 15

In or about 1930, Raymark arranged with the Metropolitan Insurance Company to perform industrial hygiene studies at Raymark plants. The purpose of the study was to make recommendations for the elimination of conditions that might present health hazards. The Metropolitan studies concerned only occupational exposure in Raymark manufacturing operations, which are quite dissimilar (in having significantly higher levels of exposure) from conditions that occur through installation of Raymark products sold for use by insulation mechanics. The results of this study, "Effects of Asbestos Dust on the Lungs of Asbestos Workers," were published by Dr. A. J. Lanza, et al., in Public Health Reports (January 4, 1935).

In 1936 Raymark, in cooperation with several other asbestos product manufacturers, made arrangements to have a study conducted by the Trudeau Foundation at Lake Saranac, N.Y. to determine the relationship, if any, between pulmonary pathologies and asbestos dust exposure. These studies were limited to experiments with animals. The principal researcher died several years after the study was conducted which significantly delayed its publication. Results of these studies are contained in a paper entitled, "Experimental Studies of Asbestosis" by Arthur Vorwald, Thomas Durkan, and Philip Pratt, published in AMA Archives of Industrial Hygiene and Occupational Medicine, January 1951, Volume 3, pages 1-43.

In 1947 Raymark participated in an industry study conducted by Industrial Health Foundation, Pittsburgh, Pa. under sponsorship of the Asbestos Textile Institute of Philadelphia, Pa. to determine the nature and magnitude of the asbestos/health problem in asbestos textile manufacturing operations. The scope of these studies did not extend to asbestos-containing products or health hazards associated with their use or application. Raymark was determined to have its processes under as good or better control at that time than any other company participating in this study. No specific recommendations were made for improvement of dust control measures at Raymark facilities, but it was recommended that medical surveillance programs of all participating companies be strengthened, and IHF recommended that an on-going program of engineering control measures be implemented throughout the industry and also recommended research on new methods of dust control and further dust studies.

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Raymark also participated in fibrous dust studies conducted by Industrial Health Foundation from 1968 through 1970 and contributed \$20,000 to these studies. To the best of its knowledge, Raymark does not have a copy of the final report from these studies. However, copies of several progress reports exist.

In 1975, Raymark contracted with the IHF to survey its plants and medical facilities and make recommendations for improved controls and medical surveillance programs for the benefit of Raymark employees.

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RIDER H

ANSWER TO INTERROGATORY NO. 19

Raymark has not yet selected expert witnesses. When such experts are selected, plaintiff will be notified as to their names, qualifications, etc. accordingly.

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