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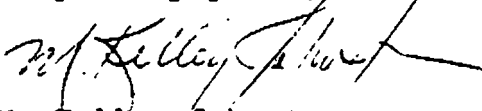
Dear Mr. Baron:

As you are aware, since the fall of 1989, Owens-Corning Fiberglas Corporation has been reviewing and updating responses to discovery requests from plaintiffs' counsel in the asbestos personal injury litigation. In this regard, OCF opened its document library in August 1989, generally supplemented discovery responses, supplemented its product chart, and provided additional information concerning asbestos-related workers' compensation claims.

When you were supplied with additional information on workers' compensation claims, you were advised that research on the topic was continuing. Research to date has revealed information which allows OCF to provide additional supplemental information regarding workers' compensation claims. Enclosed for your file is a copy of the most recent updated discovery response regarding workers' compensation claims.

OCF is providing this information in accordance with applicable court rules. Supplementing all past discovery requests would be impossible. OCF is providing the enclosed to serve as a supplement to any interrogatory response previously filed regarding information on workers' compensation claims. The enclosed is provided to you and your office for any and all cases where you or your office is an attorney of record. If there are specific cases or interrogatories in which you need supplemental answers filed with the court, please provide case name, docket number, and jurisdiction to me at the above address.

Very truly yours,


M. Kelley Johnston

MKJ:dbg

cc: Elizabeth Thompson, Esq.
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Enclosures



OCF has been named as a party in worker's compensation actions filed by persons allegedly employed at some point in time on construction jobs involving OCF's Contracting and Supply Division. These persons were typically hired from union halls for specific jobs on an as-needed basis and were not long-term employees. As a result, these claimants filed actions against numerous past and present employers. These claimants alleged a variety of injuries from exposure--throughout their employment histories--to numerous asbestos and nonasbestos-containing materials manufactured and/or distributed by a number of companies.

OCF lacks adequate records to provide a complete response to this interrogatory for a number of reasons. Individual state workers' compensation laws determined the specific employers and/or insurance carriers which could be named as defendants in compensation actions, as well as the procedures for their notification. As a result, even though some workers' compensation claims list OCF as an employer, OCF may not have received notice of the claim, and even if OCF received notice of the claim, it may not have been aware that the claim was related to asbestos exposure or that the claimant was employed by OCF. Furthermore, worker's compensation claims historically have been processed by OCF's insurance carriers and OCF's corporate headquarters did not always receive notification of individual claims.

OCF sets forth in Table A the pertinent information from OCF's records which is presently believed to be related to workers' compensation claims filed before 1974 by individuals employed by OCF's Contracting and Supply Division:

TABLE A

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF/ SAC Joined	Date of Notice to OCF	No. Other Defendants
Della, John D					Seattle, WA	----	----	1969	9
Dresley, Thomas H	11/03/16	Asbestos Insulator	--	OCF SAC Unit	Detroit, MI	"Death, pneumoconiosis, asbestosis, bronchitis, carcinoma"	1971	1971	1
Dyer, Wayne E					Los Angeles, CA	----	----	1969	24
Eilmer, Lawrence F					Flint/Grand Rapids, MI	----	----	1969	----
Erkashkin, Leonard C (aka Charles C)	07/09/07	Asbestos Insulator - Foreman	1941-1963	Armstrong Contracting & Supply	Los Angeles, CA	"Lungs affected with asbestosis"	1964-FENCO & Marine Engineering, 1967-OCF	1964-FENCO, 1966-Marine, 1967-OCF	9 other employers and their insurance carriers
Ernson, Harold F	07/31/15	Asbestos Insulator	1942-1964	OCF	Los Angeles, CA	Exposure to "Irritants" resulting in injury to "lungs & general health"	1964	1964	25 other employers and their insurance carriers
Callaway, Wilson	1910	Insulator	----	----	Baton Rouge, LA	----	----	1972	----

¹ Although OCF historical files reflect that OCF received notice and limited information on this claim, the specific information in this column was obtained from a review of the workers' compensation files which OCF counsel obtained from plaintiffs' counsel in 1979 (See discussion, infra)

TABLE A

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF / SAC joined	Date of Notice to OCF	No. Other Defendants
Carmeny, John L			Unknown but claim alleges employment w/OCF between 10-12/66		Pennsylvania		---	1967	4
Clark, Dean	12/02/07	Asbestos Insulator	1940-1966	Waldwin Ebert Hill, Inc	Los Angeles, Ca	"Inhalation of asbestos and other foreign substances"	1960	1968	55 other employers and their insurance carriers
Clark, James	----	Asbestos pipefitter	----	Fiberglass Supply & Contracting (1967-1968)	Seattle, WA	"Breathing of asbestos over period of years caused pain in chest"	----	1970	----
Cooper, Marlen W	----	----	----	----	Seattle, WA	----	----	1969	7
Everitt, Allen R	03/07/00	Asbestos Insulator	1946-1963	Western Asbestos	San Francisco, CA	----	1964	1964	34 other employers plus their insurance carriers
Frederick, H M	----	----	----	----	Fresno, CA	----	----	1966	----

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF/ SAC Joined	Date of Notice to OCF	No. Other Defendants
Funkhouser, Charles F					Los Angeles, CA			1970	
Fryer, George I	09/16/17	Asbestos Insulator	1940-1969		Oakland, CA	Injury to "lungs" from "inhalation of harmful dusts and fibers"		1971	
Gelger, Evelyn					Los Angeles, CA			1971	
Gilivich, Steven	05/16/39	Asbestos Insulator	1937-1961	FENCO - San Francisco	San Francisco, CA	Injury "to respiratory system" from "exposure to harmful dusts"	1961-FENCO 1963-OCF	1963	27 other employers plus their insurance carriers
Gonsa, Robert O	09/02/00	Asbestos Insulator/Insulation Meyer		Lorentzen & Co	San Francisco, CA	"Pneumoconiosis"	1963	1963	24 other employers and their insurance carriers
Grudeln, Robert E			1942-1969		Los Angeles, CA			1969	5
Green, Harold V	1919	Asbestos mechanic	1945-1971		San Diego, CA			1972	

TABLE A

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF/ SAC Joined	Date of Notice to OCF	No. Other Defendants
Gralescher, Paul J	05/11/02	Asbestos Insulator	1942-1961	FENCO 1961	Sacramento, CA	Application "Asbestosis", Amended Application "Pulmonary disability & pneumoconiosis"	1962	1963	22 other employers plus their insurance carriers
Hagg, Alvin A			----	----	Seattle, WA	----	----	1967	7
Hollnath, Stanley			----	----	San Francisco, CA	----	----	1969	----
Humberg, Allen	09/13/17	Asbestos Insulator	Approx 1943-1971	----	Seattle, WA	"Asbestosis" from "exposure to asbestos for 28 years"	----	1971	----
Horlick, Gerald P	----	----	----	Aber Co.	Anchorage, Alaska	----	1970	1970	3+ employers
Nilstrom, Harold	----	Insulation Installer	1942-1966	----	Seattle, WA	----	----	1971	----
Norman, Robert J	----	----	----	----	Los Angeles, CA	----	----	1969	----
Ruel, George W	----	----	----	----	Los Angeles, CA	----	----	1971	----
Lennon, Robert	----	----	Unknown (verbed for OCF between	----	Flint/Grand Rapids, MI	----	----	1968	7

2 The Workers' Compensation file OCF received from plaintiffs' counsel in 1979 reflects that this claimant also had asbestosis

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF/ SAC Informed	Date of Notice to OCF	No. Other Defendants
6 B/63)									
Larwood, Cecil B					Seattle, WA	----	----	1967	2
Metry, William L					Portland, OR	----	----	1967	----
Monley, Coleman			Unknown - worked for OCF for 2 years	----	Indianapolis, IN	----	----	1973	----
Morgan, William L	----	----	----	----	Los Angeles, CA	----	----	1968	----
Marrell, Ray B	01/11/12	Asbestos Insulator	1930-1931; 1943-1969	----	Los Angeles, CA	To "lungs" from "exposure to asbestos and other noxious dusts and fumes"	----	1969	----
Moffatt, Fred	----	----	----	----	Portland, OR	----	----	1967	----
Morre, Willie W	----	----	----	----	Seattle, WA	----	----	1969	0
Nelson, George	----	----	----	----	Phoenix, AZ	----	----	1968	----

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF / SAC Joined	Date of Notice to OCF	No. Other Defendants
Ogle, John G.	1931				Baltimore, MD			1968	
Owens, Glen B.	09/03/09	Asbestos Insulator	1940-1967		Los Angeles, CA	To "lungs, internal" from "exposure to freon/foam"	1969	1969	1
Pedgett, Susan W.	1910	Asbestos Insulator	Unknown but worked for OCF SAC until 1965-1968		Baltimore, MD			1968	
Pfingher, Edward L.	02/24/05	Pipefitter / Asbestos Insulator	1948-1967		San Francisco, CA	"Exposure to asbestos"	1969	1968	20 other employers plus their insurance carriers.
Pond, Lowell M.	11/10/06	Asbestos Insulator	1942-1967	Thorpe Insulation	Los Angeles, CA	To "lungs" from "exposure to asbestos and other noxious dust in work."	1969	1969	10
Pontz, Henry	04/25/01	Asbestos Insulator	1945-1967	Western Building Materials Co.	San Francisco, CA		1967	1967	25

³ The Workers' Compensation file OCF received from plaintiffs' counsel in 1979 reflects that this claimant also had emphysema and heart disease.

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF/ SAC Jailed	Date of Notice to OCF	No. Other Defendants
Riley, James W	10/23/09	Asbestos Insulator	1920-1957	J. T. Thorpe, Inc	Los Angeles, CA	"Lungs" due to "exposure to asbestos dust"	1957 - Marine Engineering & FERCO 1958 OCF	1957	33 other employers and their insurance carriers
Ringstrom, William					St. Louis, MO			1972	
Short, Vello D					Los Angeles, CA			1971	
Stanley, John	12/17/06	Asbestos Insulator	1943-1968		Los Angeles, CA	To "lungs" from "exposure to noxious gases including asbestos"	1969	1968	33 other employers and their insurance carriers
Thompson, Clarence E					Los Angeles, CA			1971	
Yaskol, Vernon F					Los Angeles, CA			1968	
Todor, William E					Seattle, WA			1969	9
Vincent, Charles L				R. L. Lowler, Inc	Anchorage, Alaska			1968	

OCF historical files reflect that as of 2/20/58, OCF learned that Riley's claimed injury was "possible tuberculosis." According to a review of Riley's workers' compensation file which OCF counsel obtained from plaintiff's counsel in 1979 (see discussion *infra*), OCF was served with a claim for death benefits by Riley's widow in 1961, in which she alleged that Riley's death was caused by "exposure to dust." While Riley's workers' compensation file indicates that Riley died of lung cancer, there is no indication that OCF received notice of this specific diagnosis before 1979 when OCF's counsel received the file from plaintiff's counsel.

In addition to the claims in Table A, OCF's records reflect that the following individuals, listed in Table B, also filed asbestos-related workers' compensation claims before 1974. It is believed these claims were probably handled by OCF's insurance carriers. OCF's records do not indicate when or if OCF received notice of these claims.

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date Claim Filed	Date of Notice to OGC	Re Other Defendants
Deswell, Jerome C	10/20/21	Asbestos Insulator	1952-1971		Los Angeles, CA	"Asbestos exposure, exposure to other injurious substances as well as strenuous activity - injury to respiratory and circulatory system."	1972		
Borden, Walter	1903				Detroit, MI	"Expired due to respiratory insufficiency, severe obstructive emphysema and associated carcinoma of left lung."	1972		1
Quarapelt, Vernon G	03/31/12	Asbestos Insulator	1940-1970		Sacramento, CA	Injury to "lung" from "constant exposure to asbestos fibers and other harmful materials."	1973		
Cabrer, George A	07/02/17	Asbestos Insulator	1938-1973	Fiberglas Engineering Co.	Seattle, WA	"No ill-gent manifestations, slight lung/pleural space, probable substances (presumably asbestos)."	1973		
Creese, Murray L	02/12/09	Asbestos Insulator	1942-1971		Los Angeles, CA	Injury to "lung" from "exposure to asbestos and other noxious dusts and fumes."	1972		
Morris, Ray B					Phoenix, AZ		1973		
Kramer, Burton					Washington		1960		

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date Claim Filed	Date of Notice to OCF	Re Other Defendants
Lindholm, Mirvika					Seattle, WA		1973		
McClure, Art	08/01/11	Asbestos Insulator	1946-1969	..	Oakland, CA	"Asbestosis"	1971	..	..
Meyers, Edward		..	..		San Francisco, CA		1982		
Olson, Orlis D			..	Johns-Manville Sales Corp	Detroit, MI	"Asbestosis, pneumoconiosis, heart and lung pathology and related conditions - terminating totally"	1970		
Perkins, Robert R	08/19/13	Asbestos Insulator	1943-1972		Los Angeles, CA	"In, 'lungs and respiratory system' from 'exposure to asbestos and other noxious dusts'"	1972		
Rogers, Joseph	1921	Asbestos Insulator	1947-1972	OCF	Minneapolis, MN	"Fibrosis of lungs"	1972		
Simpson, David L	05/21/29	Asbestos Insulator	1951-1971		Seattle, WA		1971		
Stenotic, Lee W	08/03/04	Insulator	1942-1966		Los Angeles, CA	"Exposure to irritants"	1967		

Table B

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date Claim Filed	Date of Notice to OCF	Re Other Defendants
Swindell, David					Sacramento, CA				
Winters, Leroy E					Albuquerque, NM		1959		

1 The only information OCF has on this claim is that it was apparently asbestos-related and that OCF's insurance carrier closed the file on this claim in 1975.

In the course of litigation, a certain plaintiffs' counsel produced to OCF's Law Department portions of workers' compensation files purporting to be claims filed by various insulation workers and other tradesmen. It is believed that these files were originally obtained from codefendants or from public records, and copies were forwarded to OCF's Law Department in approximately 1979.

Some of these files reflect claims apparently filed against OCF which OCF cannot currently verify from a review of its records. Table C sets forth information from such claims where OCF was presumably a party.

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF/ SAC Joined	Date of Notice to OCF	No. Other Defendants
Bellay, Carl A	08/05/10	Asbestos Insulator	1935-1964	FENCO	Los Angeles, CA	"Inhalation of foreign matter"	1965	1965	11 other employers and their insurance carriers
Crader, Willard R	01/18/07	Asbestos insulator	1938-1964	FENCO	Los Angeles, CA	Injury to "lungs, body" from "exposure to irritants"	1966	1966	41 other employers and their respective insurers
Curtis, Harvey E	07/29/08	Pipecovering Mechanic	1949-1954	OCF, ACBS	Detroit, MI	Original application not found Petition to Reopen alleged "pneumocystis, asbestosis, emphysema, asthma, bronchitis and heart failure."	1960 - original claim, 1967 - claim reopened	----	30 other employers & their ins. carriers (None to first claim; 30 to second claim.)
Gronenthal, John B	04/30/05	Pipecoverer/ Insulator	1942-1960	Asbestos Products Co.	Spokane, WA	Asbestosis, chronic interstitial pneumonitis, pneumoconiosis "probably due to asbestos"; pleurisy - both sides.	1961 - appeal	1961 - appeal	10 other employers
Harding, Clifford P	02/28/96	Asbestos Insulator	1937-1959	M. R. Carpenter	Sacramento, CA	"Asbestosis"	----	1961	12 other employers and their insurance carriers

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF/ SAC Joined	Date of Notice to OCF	No. Other Defendants
Hunt, Melvin			1940-1965	---	Long Beach, CA	---	---	---	17 other employers and their insurance carriers
Iambellis, Vernon E	11/29/12	Insulator	1942-1965	United Cork Co /Bellevue Ehret Hill	Los Angeles, CA	Injury to chest as result of "exposure to dust - stressors & strain of employment"	1966	---	61 other employers and their insurance carriers
McCarrell, Ervey O	03/02/01	Insulation Worker	1941-1956	Armstrong Cork	Los Angeles, CA	"Insulation dust drawn into lungs" Injury to throat & lungs	1959	1959	8 other employers and their insurance carriers
Miller, Arthur H	11/02/09	Asbestos Insulator	1941-1961	Plant Asbestos	Los Angeles, CA	"Lung condition - occupational disease" from "inhalation of asbestos materials"	1962	1962	24 other employers and their insurance carriers
Novak, Edward	11/18/14	Asbestos Insulator	1940-1956	Plant Insulating, Jackson Peckling, Rees Insul Co	Los Angeles, CA	"Asbestosis and/or lung condition"	1963	1964	9 other employers and their insurance carriers

¹ The Workers' Compensation file OCF received from plaintiff's counsel in 1979 reflects that this claimant had bronchial asthma and advanced pulmonary emphysema. The claim was dismissed.

² The Workers' Compensation file OCF received from plaintiff's counsel in 1979 reflects that this claimant also had progressive coronary artery disease.

Claimant Name	Date of Birth	Alleged Trade	Alleged Years Worked	Alleged Last Employer	Location	Injury Claimed in Application	Date OCF / SAC Joined	Date of Notice to OCF	No. Other Defendants
Hegura, Dille W	02/13/05	Insulation Mechanic	1942-1963	FEMCO	Los Angeles, CA	Pulmonary fibrosis - lungs & chest "due to exposure to foreign matter in material used in employment" -	1964	1964	9 other employers and their insurance carriers
Staples, John D	06/24/25	Heat & Frost Insulator	1953-1962	Armstrong Contracting & Supply	Long Beach, CA	"Exposure to asbestos dust, fiberglass and other irritants--lungs & respiratory system"	1962	1962	15 other employers plus their insurance carriers
Stratthorn, L J	----	Insulation Installer	1944-1959	Plant Asbestos Co	San Francisco, CA	"Chest disability namely pneumoconiosis, probably asbestosis." -	1960	1960	14 other employers and their insurers
Stitchland, Fred E	06/22/07	Asbestos Insulator	1943-1957	Armstrong Cork	San Francisco, CA	"Aggravation of pre-existing tubercular condition" from "working w/asbestos" -	1958	1957	10 other employers and their insurance carriers
Wynn, John	10/14/99	Asbestos Insulator	----	Hundel Cork	San Francisco, CA	"Chest disability"; "exposure to dust and foreign substances over many years"	Unknown, lit. from claimant's atty dated 8/18/62 attaches petition for judgment of additional parties, including OCF, although no Order in file	1962	30 other employers and their insurance carriers

3 The Workers' Compensation file OCF received from plaintiff's counsel in 1970 reflects that this claimant also had emphysema.

4 The Workers' Compensation file OCF received from plaintiff's counsel in 1970 reflects that this claimant had asthma, cardiac disease and carcinoma of the stomach. The claim was dismissed.

5 The Workers' Compensation file OCF received from plaintiff's counsel in 1970 reflects that the state referees could not find any medical evidence of record to support compensability.

The following employees of OCF's Berlin, New Jersey Raylo manufacturing plant also filed workers' compensation claims against OCF before 1974, in which they alleged injury from exposure to asbestos in the plant environment:

<u>Name</u>	<u>Approx. Date of Claim Filed</u>	<u>Alleged Injury</u>
Albert Behnke	09/15/72	Chronic bronchitis; emphysema, cirrhosis of the liver
William Bodine	03/21/73	Asbestosis, emphysema
Harry Copeland	1/22/72	Pulmonary asbestosis
Floyd Regn	06/14/71	Chronic pulmonary obstructive disease, pneumoconiosis
George Zepp	07/13/72	Pneumoconiosis, asbestosis

In 1965, OCF learned that a Berlin worker had apparently contracted asbestosis; however, the injury was apparently not related to work at OCF and, to OCF's knowledge, no workers' compensation claim was filed against OCF.

When OCF purchased the Bloomington, Illinois plant from UNARCO in 1970, it acquired certain files pertaining to workers' compensation claims brought against UNARCO by its employees. OCF, however, did not have knowledge of these claims until it purchased the plant in 1970. Some of these claims alleged injury from exposure to asbestos in the plant environment.

A few employees of other OCF manufacturing plants filed asbestos-related workmen's compensation claims before 1974. It

is not known whether these employees were actually exposed to asbestos in connection with their employment for OCF.

Additional information pertinent to the subject matter of this interrogatory would be contained in OCF's files related to asbestos.

OCF has collected numerous records and documents relating to asbestos generally. These documents are stored in OCF's document library located in Richmond, Virginia.

The document library contains existing documents generated and/or received at OCF's corporate headquarters in Toledo, Ohio; its technical center in Granville, Ohio; and its manufacturing facilities in Berlin, New Jersey; Bloomington, Illinois; Newark, Ohio; and Santa Clara, California. The library also contains certain files obtained from Fiberglas Engineering and Supply Company in San Francisco, California, and Seattle, Washington. Other documents relating to Fiberglas Engineering and Supply Company of San Francisco are maintained by the law firm of Popelka, Allard, McCowan & Jones in San Jose, California, pursuant to an agreement contained in Defendant OCF's response to Plaintiffs' Request for Production in Malay, et al. v. Fibreboard, et al., June 10, 1989. Additional documents relating to OCF's supply and contracting units may be in the possession of various OCF trial counsel.

The library contains responsive, non-privileged materials generated before and during the time that OCF manufactured asbestos-containing Kaylo insulation.

At a mutually convenient time, OCF will make available for inspection by plaintiff's counsel the non-privileged documents stored in its document library. Counsel for OCF will provide an index, which sets forth the file titles of those files contained in each box, and personnel to assist plaintiff's counsel in locating documents responsive to the discovery requests in this matter. OCF will also make arrangements for copying documents which plaintiff's counsel may select. Copying and shipping costs will be borne by plaintiff, unless otherwise ordered by the Court.

OCF's library includes documents that contain information which is considered to be proprietary and trade secret. Therefore, such documents will be produced only after the entry of an appropriate protective order.

OCF has removed from the library any existing materials which it contends are protected from discovery as privileged attorney-client communications, attorney work product materials, or otherwise beyond the scope of permissible discovery. Each document removed as privileged has been substituted with an easily identifiable marker which describes the privileged document by document type, (e.g., memo, letter, note), date, author, recipient, subject matter, and basis for objection. These markers may be designated for copying in the same manner as non-privileged documents.

Visits to the library may be scheduled through OCF's local counsel.