

FILE NAME: Hampshire (HAMP)

DATE: 1994 Mar

DOC#: HAMP111

DOCUMENT DESCRIPTION: Legal - Hampshire's Supplemental
Answers to Interrogatories

Hampshire's Supplemental Answers to Master Interrogatory
Abate 3/94

INTERROGATORY NO. 161:

State your understanding of what legal duties or obligations you have or had concerning testing, inspection, design, manufacturing and use of the asbestos-containing products identified in your Answers to Interrogatory Nos. 8 and 19 before and after marketing them for sale.

ANSWER TO INTERROGATORY NO. 161:

See Answers to Interrogatories Nos. 84 and 146.

Hampshire was never a manufacturer, nor even a distributor or seller, of asbestos-containing materials. Hampshire is a contractor, and any time it used such materials, it did so pursuant to specifications of building owners and architects, and did so pursuant to manufacturers' standards for use of such materials. Hampshire relied on the expertise of architects and manufacturers regarding safe standards for use of such materials. As a small Baltimore-based interior finish contractor, which did not manufacture any material, Hampshire had no duty, much less capability, to conduct tests, or inspections regarding alleged potential health hazards posed by any materials it may have used.

INTERROGATORY NO. 202:

If you had a sales or other office or manufacturing or storage facility located in Maryland, Pennsylvania, Delaware, Washington, D.C. and/or Virginia state the following:

- (a) The address and type (whether sales office, executive offices, manufacturing, packaging, warehouse, shipping or other) of each office or facility;
- (b) Dates each office or facility was open and in operation;
- (c) The area or territory of responsibility for each such office or area or territory covered by the operations of each facility;
- (d) The identify of any asbestos-containing products that were manufactured, packaged or stored in such facility

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and the dates applicable thereto;

- (e) The identify of any asbestos-containing products that were sold, distributed or supplied from each such office or facility and the dates applicable thereto.

ANSWER TO INTERROGATORY NO. 202:

Hampshire Industries, Inc. has had contracting offices in Richmond, Virginia, Springfield, Virginia, and Roanoke, Virginia from some time prior to 1975 until 1980 or 1981, in Norfolk, Virginia from some time prior to 1975 until approximately 1977, in Charleston, West Virginia until approximately 1982, in Bladensburg, Maryland from some time prior to 1975 until 1982, and in Beltsville, Maryland from 1982 to 1992.

INTERROGATORY NO. 204:

If you ever received notification or awareness of the failure of any of your asbestos-containing products to perform as intended by you, state:

- (a) The name of the product;
- (b) The problem or failure discovered or of which you became aware;
- (c) The date you initially became aware of such problem or failure;
- (d) The time period during which you received notification of continued existence of such problem or failure;
- (e) Any actions taken by you as a result of such awareness;
- (f) Any labelling placed by you on packages of such products providing notification of such problem or failure;
- (g) The identify of any document prepared by you relating to the problem or failure;
- (h) Any decision by you to withdraw the defective product or to limit its production and/or availability.

ANSWER TO INTERROGATORY NO. 204: