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WARTNICK LAW FIRM

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8 Attorneys for Defendant
9 A.P. GREEN SERVICES, INC.
10 f/k/a Bigelow-Liptak Corporation

11 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 IN AND FOR THE COUNTY OF SAN FRANCISCO

13 JAMES BARRINGER,) NO. 971279
14)
15 Plaintiff,)
16)
17 vs.)
18)
19 RAYBESTOS-MANHATTAN, et al.,)
20)
21 Defendants.)

22 PROPOUNDING PARTY: Plaintiff JAMES BARRINGER

23 RESPONDING PARTY: Defendant A. P. GREEN SERVICES, INC.

24 SET NUMBER: ONE

25 Defendant, A.P. GREEN SERVICES, INC., hereby responds to
26 plaintiff's Form Interrogatories, Set Number One, as follows:

27 RESPONSE TO INTERROGATORY NO. 1.1.

28 Duane Grummer, Maureen McTague
Lynch, Gilardi & Grummer
50 Francisco Street, Suite 400
San Francisco, CA 94133.

RESPONSE TO INTERROGATORIES No. 3.0.

3.1 Yes.
(a) A.P. Green Services, Inc.
(b) Bigelow Liptak Corporation, up to 1986.
(c) Michigan, 1926.

1 (d) Mexico, Missouri
2 (e) No.

3 3.2 No.

4 3.3 No.

5 3.4 No.

6 3.5 No.

7 RESPONSE TO INTERROGATORIES NOS. 4.1, 4.2, 12.1, 12.2, 12.3, 12.4,
8 12.5, 12.6, 12.7, 13.1, 13.2, 14.1, 14.2, 16.1, 16.2, 16.3, 16.4,
9 16.5, and 16.6

10 This defendant objects to the use of the term "INCIDENT" in the
11 context of asbestos litigation. As defined in these
12 interrogatories, "INCIDENT" means a set of circumstances surrounding
13 an injury. Plaintiff alleges that he suffered scores of such
14 "injuries" at his numerous job sites, on numerous occasions, as a
15 result of circumstances particular to each job site and as a result
16 of the actions or omissions of various defendants. It is not
17 specified in the complaint or in these interrogatories which of
18 these particular sites is the "INCIDENT" which is the subject of
19 this interrogatory. Thus, this interrogatory is vague, ambiguous,
20 and unintelligible in the context of this lawsuit.

21 RESPONSE TO INTERROGATORY NO. 15.1.

22 This defendant objects to the use of the term "INCIDENT" in the
23 context of asbestos litigation. As defined in these
24 interrogatories, "INCIDENT" means a set of circumstances surrounding
25 an injury. Plaintiff alleges that he suffered scores of such
26 "injuries" at his numerous job sites, on numerous occasions, as a
27 result of circumstances particular to each job site and as a result
28 of the actions or omissions of various defendants. It is not

1 specified in the complaint or in these interrogatories which of
2 these particular sites is the "INCIDENT" which is the subject of
3 this interrogatory. Thus, this interrogatory is vague, ambiguous,
4 and unintelligible in the context of this lawsuit.

5 Defendant objects to this interrogatory to the use of the term
6 "material allegation." The complaint does not contain any
7 allegation which are particularly relevant to this defendant.
8 Rather, the complaint contains allegations generic to hundreds of
9 defendants, and it is not specified at which location or in what
10 manner this plaintiff was allegedly exposed to asbestos as a result
11 of the acts or omissions of this defendant. This defendant denied
12 the generic allegations of the complaint on information and belief,
13 and cannot respond further at this time. Similarly, this defendant
14 stated several affirmative defenses in its answer in order to avoid
15 possible waiver of them, and cannot provide further information at
16 this time.

17 Dated: January 27, 1997

LYNCH, GILARDI & GRUMMER

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20 By Maureen McTague
Maureen McTague
Attorneys for Defendant
A.P. GREEN SERVICES, INC.
f/k/a Bigelow-Liptak
Corporation

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23 ASB\GC212\PRES.FI
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28

1 PROOF OF SERVICE

2 I certify that I am over the age of 18 years and not a party to
3 the within action; that my business address is 50 Francisco Street,
4 Suite 400, San Francisco, CA 94133; and that on this date I served
5 a true copy of the document(s) entitled: **A. P. Green Services,**
6 **Inc.'s RESPONSE TO FORM INTERROGATORIES** in the matter of **Barringer,**
7 **James (PR: Thomas) v. Raybestos-Manhattan (SF-971279)** on the
8 following parties:

9 Harry F. Wartnick, Esq.
10 101 California Street, 26th Fl.
11 San Francisco, CA 94111
12 Fax: (415)391-5845

Berry & Berry
1300 Clay Street, 9th Fl.
Station D - P.O. Box 70250
Oakland CA 94612-1428
Fax: (510) 835-5117

12 Service was effectuated by forwarding the above noted document to
13 Berry & Berry by Regular Mail and to the firm representing
14 Plaintiff(s) in the following manner:

- 14 X **By Regular Mail** in a sealed envelope, addressed as noted
15 above, with postage fully prepaid and placing it for
16 collection and mailing following the ordinary business
17 practices of Lynch, Loofbourrow, Gilardi & Grummer.
- 18 **By Hand Delivery** in a sealed envelope, addressed as noted
19 above, through services provided by Lightning Messenger and
20 billed to Lynch, Loofbourrow, Gilardi & Grummer.
- 21 **By Facsimile** to the numbers as noted above by placing it for
22 facsimile transmittal following the ordinary business
23 practices of Lynch, Loofbourrow, Gilardi & Grummer.
- 24 **By Overnight Courier** in a sealed envelope, addressed as
25 noted above, through services provided by Federal Express
26 and billed to Lynch, Loofbourrow, Gilardi & Grummer.

22 I declare under penalty of perjury that the foregoing is true
23 and correct.

24 Executed on 1-29-97, at San Francisco, California.

25 *Inch Canday*

26 \USR\ASB\gc212\PI\POS-A&A