

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

IN RE: ASBESTOS-RELATED LITIGATION)
) WDCP-83-1
)

DEFENDANT GENERAL ELECTRIC COMPANY'S
RESPONSE TO PLAINTIFFS'
"SUPPLEMENTAL INTERROGATORIES TO DEFENDANTS"

COMES NOW the defendant General Electric Company
(hereinafter "General Electric"), and for its response to
plaintiffs' "Supplemental Interrogatories to Defendants," dated
June 27, 1989, states as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

General Electric has manufactured and continues to manufacture a great variety of products, concentrating primarily in the area of electrical equipment for both individual consumers and industry, although General Electric's current business extends beyond manufacturing. However, General Electric is not now, nor has it ever been, a manufacturer of "asbestos-containing products" as it understands the meaning of that phrase to be, as used in the plaintiffs' "Supplemental Interrogatories to Defendants." General Electric therefore objects generally to plaintiffs' use of the term "asbestos-containing products" on the grounds that it makes the interrogatories overly broad, unduly burdensome, vague, ambiguous, seek irrelevant information, and not reasonably calculated to lead to the discovery of relevant, admissible or discoverable evidence.



The broad subject matter and time period addressed in plaintiffs' interrogatories make it impossible to conduct a complete search within General Electric for information necessary to answer these interrogatories. However, in good faith and in the spirit of cooperation, General Electric has responded to these interrogatories with that information presently available which General Electric deems as being potentially relevant to plaintiffs' claims. The following answers are based upon prior and on-going discussions with General Electric personnel and reviews of documents. However, various records of General Electric have from time to time been discarded in the ordinary course of business, so these responses are based upon such information as is presently reasonably available to General Electric and susceptible to retrieval through reasonable efforts.

General Electric has directed these interrogatories to employees whose present duties indicate a reasonable likelihood that they may possess pertinent, discoverable information. As this litigation relates to individuals who allege prior employment at Duke Power Company in the vicinity of steam turbine-generators, the search for information and documentation to answer these interrogatories has been directed to General Electric's Turbine Business Operations in Schenectady, New York. Turbine Business Operations is the General Electric component on whose behalf these interrogatories are answered.

General Electric objects to plaintiffs' interrogatories generally to the extent that plaintiffs' "Definitions and

Instructions" seek to impose duties upon General Electric beyond those required by the Federal Rules of Civil Procedure or to the extent that those instructions or the interrogatories seek information protected by the attorney-client privilege or attorney work product doctrine. General Electric further objects generally to plaintiffs' interrogatories to the extent that they might be considered to seek the "knowledge" of the corporate entity of General Electric on any subject. General Electric has knowledge only through its employees, and it is impossible to set forth the collective knowledge of all General Electric employees past and present.

General Electric reserves the right to supplement or modify these answers to interrogatories at any time should additional information from documents or individuals require such in order to maintain the accuracy of these responses.

RESPONSES TO PLAINTIFFS' INTERROGATORIES

INTERROGATORY NO. 1: Did you ship any asbestos-containing products to UNITHERM, INC. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
 - (b) Point of origin of each shipment;
 - (c) Identity and quantity of products shipped;
 - (d) Locations (addresses) to which products were shipped;
- and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 1 on the grounds that it is overly broad, unduly burdensome and harassing, seeks irrelevant information, and is not reasonably calculated to lead to the discovery of relevant, admissible or discoverable evidence. Plaintiffs have thus far made no allegations, either through their pleadings or through discovery conducted thus far, that they were either employed by or in any way exposed to any asbestos-containing products which were shipped by General Electric to the entity identified in this interrogatory. Further, see General Electric's "Preliminary Statement and General Objections." Without waiver of these objections and subject thereto, General Electric states that it has not shipped any steam turbine-generators to the entity identified in this interrogatory.

INTERROGATORY NO. 2: Did you ship any asbestos-containing products to United Thermal Systems, Inc. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
 - (b) Point of origin of each shipment;
 - (c) Identity and quantity of products shipped;
 - (d) Locations (addresses) to which products were shipped;
- and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 2 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 3: Did you ship any asbestos-containing products to Vogt and Company at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 3 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 4: Did you ship any asbestos-containing products to PH Sales at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 4 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 5: Did you ship any asbestos-containing products to Porter Hayden at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 5 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 6: Did you ship any asbestos-containing products to Reid Hayden at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 6 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 7: Did you ship any asbestos-containing products to National Service Industries at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 7 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 8: Did you ship any asbestos-containing products to North Brothers Company at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 8 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 9: Did you ship any asbestos-containing products to South Insulation Company at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 9 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 10: Did you ship any asbestos-containing products to Starr Davis Co., Inc. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 10 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 11: Did you ship any asbestos-containing products to Covil Insulation Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 11 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 12: Did you ship any asbestos-containing products to Great Barrier Insulation at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 12 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 13: Did you ship any asbestos-containing products to Standard Insulation Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 13 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 14: Did you ship any asbestos-containing products to Bonitz Insulation Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 14 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 15: Did you ship any asbestos-containing products to Daniel Construction Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 15 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 16: Did you ship any asbestos-containing products to Mill-Power Supply Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and

- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 16 on the grounds that it is overly broad and unduly burdensome, and on the grounds stated in its "Preliminary Statement and General Objections." Without waiver of these objections and subject thereto, General Electric states that from time to time in the past, it has done business with Mill-Power Supply Co., in its capacity as the purchasing agent for Duke Power Company, in connection with General Electric's sales to Duke Power Company of steam turbine-generators, and General Electric's service of that equipment. Additionally, see General Electric's response to Interrogatory No. 29.

INTERROGATORY NO. 17: Did you ship any asbestos-containing products to Findley Insulation Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 17 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 18: Did you ship any asbestos-containing products to Guy M. Beaty Company at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 18 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 19: Did you ship any asbestos-containing products to Babcock & Wilcox at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 19 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 20: Did you ship any asbestos-containing products to Flakt Inc. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 20 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 21: Did you ship any asbestos-containing products to Envirotech Corp. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 21 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 22: Did you ship any asbestos-containing products to Bahnson Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 22 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 23: Did you ship any asbestos-containing products to Sanders Brothers, Inc. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 23 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 24: Did you ship any asbestos-containing products to Teachey Mechanical, Inc. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 24 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 25: Did you ship any asbestos-containing products to Flame Refractories, Inc. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 25 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 26: Did you ship any asbestos-containing products to Carolina Refractories at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 26 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 27: Did you ship any asbestos-containing products to C. E. Thurston and Sons, Inc. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 27 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 28: Did you ship any asbestos-containing products to Joe Moore & Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 28 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 29: Did you ship any asbestos-containing products to Duke Power Co. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each shipment.

ANSWER: General Electric objects to Interrogatory No. 29 on the grounds that it is overly broad and unduly burdensome, and on

the grounds stated in its "Preliminary Statement and General Objections." Without waiver of these objections and subject thereto, General Electric states that from time to time in the past, it has sold to Duke Power Company steam turbine-generators, related equipment, and replacement parts, some of which may have contained asbestos-containing products manufactured by others. In connection with its sale of this equipment, from time to time General Electric has subcontracted with others for the furnishing of related thermal insulation materials manufactured by others to Duke Power Company, some of which contained asbestos. General Electric's records indicate that the following steam turbine-generators were sold to Duke Power Company, with each turbine-generator being shipped from Schenectady, New York, and being delivered to the designated Duke Power Company plant site:

1. Cliffside Unit #2 shipped in 1939.
2. Cliffside Unit #1 shipped in 1940.
3. Buck Unit #3 shipped in 1941.
4. Buck Unit #4 shipped in 1941.
5. Cliffside Unit #4 shipped in July 1948.
6. Dan River Unit #1 shipped in August 1949.
7. Dan River Unit #2 shipped in October 1949.
8. Lee Unit #1 shipped in October 1950.
9. Lee Unit #2 shipped in March 1951.
10. Buck Unit #5 shipped in December 1952.
11. Buck Unit #6 shipped in January 1953.
12. Riverbend Unit #6 shipped in March 1954.

13. Riverbend Unit #7 shipped in April 1954.
14. Dan River Unit #3 shipped in March 1955.
15. Allen Unit #1 shipped in October 1956.
16. Allen Unit #2 shipped in November 1956.
17. Lee Unit #3 shipped in March 1958.
18. Allen Unit #3 shipped in January 1959.
19. Allen Unit #4 shipped in July 1959.
20. Allen Unit #5 shipped in December 1960.
21. Marshall Unit #1 shipped in March 1964.
22. Marshall Unit #2 shipped in April 1965.
23. Marshall Unit #3 shipped in June 1968.
24. Marshall Unit #4 shipped in March 1969.
25. Cliffside Unit #5 shipped in January 1972.
26. Oconee Unit #1 shipped in June 1970.
27. Oconee Unit #2 shipped in December 1970.
28. Oconee Unit #3 shipped in May 1972.
29. Catawba Unit #1 shipped in November 1978.
30. Catawba Unit #2 shipped in July 1979.

INTERROGATORY NO. 30: Did you ship any asbestos-containing products to A. P. Green Refractories at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;

- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each
shipment.

ANSWER: General Electric objects to Interrogatory No. 30 on the same grounds stated in objection to Interrogatory No. 1.

INTERROGATORY NO. 31: Did you ship any asbestos-containing products to A. Lynn Thomas Co. Inc. at any of their North Carolina or South Carolina locations during the period from 1935 through 1980? If so, state:

- (a) Exact date(s) of said shipments;
- (b) Point of origin of each shipment;
- (c) Identity and quantity of products shipped;
- (d) Locations (addresses) to which products were shipped;
and
- (e) Name and position of individual who received each
shipment.

ANSWER: General Electric objects to Interrogatory No. 31 on the same grounds stated in objection to Interrogatory No. 1.

This the 28th day of August, 1989.

Gerard H. Davidson, Jr. (N.C. Bar No. 5132)
Timothy Peck (N.C. Bar No. 9991)

Attorneys for Defendant
General Electric Company

By: _____

Tim Peck

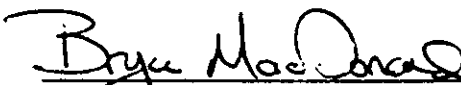
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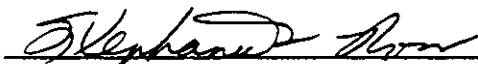
STATE OF NEW YORK)
)
COUNTY OF SCHENECTADY)

VERIFICATION

Bryce MacDonald, being duly sworn, deposes and says that he has read the foregoing "Defendant General Electric Company's Response to Plaintiffs' 'Supplemental Interrogatories to Defendants'" and is familiar with the contents thereof; that the deponent is without personal knowledge of the matters stated in the foregoing "Defendant General Electric Company's Response to Plaintiffs' 'Supplemental Interrogatories to Defendants'" and is informed and believes that no officer or employee of General Electric Company has personal knowledge of all such matters; that the foregoing "Defendant General Electric Company's Response to Plaintiffs' 'Supplemental Interrogatories to Defendants'" has been assembled by authorized employees and counsel of General Electric Company who have informed deponent that the foregoing "Defendant General Electric Company's Response to Plaintiffs' 'Supplemental Interrogatories to Defendants'" is true; and that to the best of deponent's knowledge this "Defendant General Electric Company's Response to Plaintiffs' 'Supplemental Interrogatories to Defendants'" is true.


Bryce MacDonald
Counsel, General Electric Company

Subscribed and sworn to before me
this 25th day of August, 1989.


Notary Public in and for
said County and State

My Commission Expires: 7/31/91

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing
"Defendant General Electric Company's Response to Plaintiffs'
'Supplemental Interrogatories to Defendants'" has been served
upon the following known counsel for the various parties by
mailing copies thereof via first-class mail, postage prepaid,
addressed as follows:

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This the 28th day of August, 1989.



Timothy Peck (N.C. Bar No. 9991)

Attorney for Defendant
General Electric Company