

IN THE COURT OF COMMON PLEAS
BUTLER COUNTY, OHIO

ROGER DALE BLAKE, ET AL.,

Plaintiffs,

-Against-

CASE NO. CV96 01 0191
(Hon. George Elliott)

A-BEST PRODUCTS COMPANY, ET AL.,

Defendants.

**DEFENDANT RAPID-AMERICAN CORPORATION'S SUPPLEMENTAL RESPONSES
TO PLAINTIFFS' MASTER SET OF INTERROGATORIES**

Pursuant to the Ohio Rules of Civil Procedure, Defendant Rapid-American Corporation ("Rapid") by its attorneys, McCarthy, Lebit, Crystal & Haiman Co., L. P. A., hereby supplements its answers to Plaintiffs' Interrogatories Propounded to Defendant Rapid-American Corporation (the "Interrogatories") as follows:

3. Please describe Defendant's corporate history including any:
 - i. Mergers;
 - ii. Consolidations;
 - iii. Asset purchases;
 - iv. Acquisitions; or
 - v. Spinoffs.

ANSWER:

Rapid has never directly acquired any company that was itself involved in the manufacturing and/or sale of asbestos or asbestos-containing products. By agreement of merger dated October 5, 1972, Rapid-American Corporation, an Ohio corporation, did agree to merge with Glen Alden Corporation, a Delaware corporation. At the time of this October 5, 1972 merger, neither Rapid nor Glen Alden had any involvement whatsoever in the mining, manufacturing, sale or distribution of asbestos or asbestos-containing products, and neither has had any such involvement since October 5, 1972. On December 28, 1966, a plan and agreement of merger was executed by officers of The Philip Carey Manufacturing Company ("Old Carey") and Glen Alden Corporation. On May 31, 1967, Old Carey ceased doing business, and all assets, properties, goodwill, business and liabilities were assigned to New Carey (The Philip Carey Manufacturing Company, an Ohio corporation formerly known as XPRU Corporation). New Carey was a wholly-owned independent subsidiary of Glen Alden Corporation which was never merged into Glen Alden Corporation or Rapid in any respect. On January 23, 1968, New Carey changed its name to Philip Carey Corporation. A certificate of amendment to its articles of incorporation, evidencing this name change, was filed with the Secretary of State for the State of Ohio on February 16, 1968. On April 9, 1970, New Carey (Philip Carey Corporation) was merged into Briggs Manufacturing Company, a Michigan corporation, which simultaneously changed its name to Panacon Corporation.

On April 17, 1972, Glen Alden Corporation, a majority stockholder in Panacon Corporation (owning 6,528,739 shares of common stock of Panacon Corporation out of a total of 7,356,000 shares of class A Common Stock of Panacon) entered into an agreement whereby the stock of Panacon owned by Glen Alden was sold to The Celotex Corporation. By June 30, 1972, Panacon

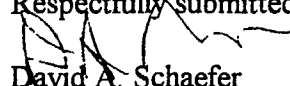
55. Does Defendant admit that service of process was properly had on it in these cases? If not, please state why.

ANSWER:

Yes.

Dated: March 27, 1997

Respectfully submitted,



David A. Schaefer

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ATTORNEYS FOR DEFENDANT
RAPID-AMERICAN CORPORATION

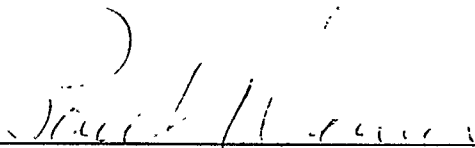
VERIFICATION

STATE OF NEW YORK §

COUNTY OF NEW YORK §

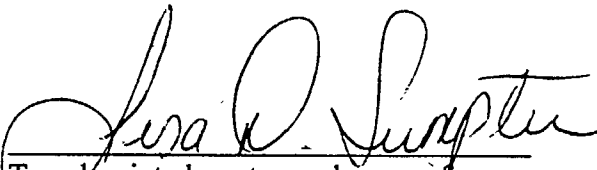
I, PAUL WEINER, am Vice-President of RAPID-AMERICAN CORPORATION, and am duly authorized to execute, under oath and on behalf of RAPID-AMERICAN CORPORATION, the attached Rapid-American Corporation's Supplemental Responses to Plaintiffs' Master Set of Interrogatories.

The information set forth in these Responses was collected by corporate personnel and other persons with knowledge of the facts; such information is not necessarily within my personal knowledge. However, on behalf of the corporation I solemnly affirm, under the penalties of perjury, that the foregoing Responses are true and accurate to the best of my knowledge, information and belief.



PAUL WEINER

SUBSCRIBED AND SWORN TO BEFORE ME on this the 2nd day of April, 1997
by the said PAUL WEINER, to certify which witness my hand and official seal.

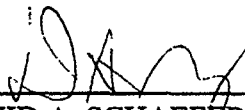


Typed, printed or stamped name of
Notary Public, in and for the
State of New York
My commission expires:
May 20, 1998

LISA D. SUMPTER
Notary Public, State of New York
No. 01SU5080391
Qualified in Bronx County
Certificate Filed in New York County
Commission Expires May 20, 1998

CERTIFICATE OF SERVICE

A copy of Defendant Rapid American Corporation's Supplemental Responses to Plaintiffs' Master Set of Interrogatories has been mailed this 3 day of April, 1997 to Steven D. Wolens, Esq., Baron & Budd, The Centrum, Suite 1100 , 3102 Oak Lawn Avenue, Dallas, TX 75219.



DAVID A. SCHAEFER