

COPY

PLAINTIFF'S EXHIBIT

MBL-371

No. 1990-23333

IN RE:

ASBESTOS LITIGATION

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IN THE DISTRICT COURTS OF

HARRIS COUNTY, TEXAS

888th JUDICIAL DISTRICT

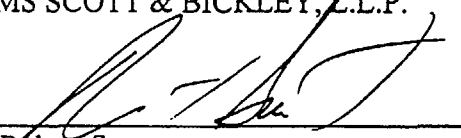
**DEFENDANT MOBIL OIL CORPORATION'S ANSWERS TO
PLAINTIFFS' MASTER SET OF INTERROGATORIES**

TO: All Plaintiffs' counsel in Harris County Asbestos cases.

Mobil Oil Corporation, one of the Defendants in the above-entitled and numbered cause, and hereinafter "Mobil", appears to submit its Answers to Plaintiffs' Master Set of Interrogatories.

Respectfully submitted,

ABRAMS SCOTT & BICKLEY, L.L.P.

By: 

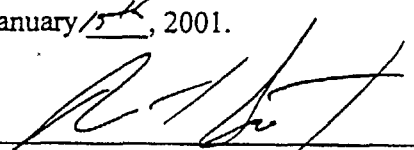
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ATTORNEYS FOR DEFENDANT,
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FILED
1990-23333
CLERK OF DISTRICT COURT
HARRIS COUNTY, TEXAS
OCT 10 1990

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Defendant Mobil Answers to Plaintiffs' Master Set of Interrogatories was forwarded to all counsel of record via certified United States Mail, return receipt requested on January 15th, 2001.



Robert Scott

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

PRELIMINARY STATEMENT

The information provided in these discovery responses was assembled by authorized employees and counsel for Mobil and was obtained primarily from a review of Mobil's records. Because the information sought by Plaintiffs concerns events that occurred many years ago, it is difficult, if not impossible, to retrieve or reconstruct some of the information requested by Plaintiffs. In addition, Mobil sold its paint and coatings division which manufactured its asbestos-containing products to the Valspar Corporation in 1984. As required under the terms of that sale, the business records of the division were transferred to Valspar. Accordingly, Mobil reserves the right to amend these responses if new or more accurate information becomes available or if errors are discovered. Furthermore, Mobil responds to these Discovery Requests without prejudice to its right to rely at trial on subsequently discovered information or on information omitted inadvertently as a result of mistake, error or oversight. It is also noted that persons who are not now employees, officers, directors or managing agents of Mobil may have information relevant to the subject matter of these requests, and Mobil does not purport, in the following responses, to give the response of any such person.

OBJECTIONS APPLICABLE TO ALL DISCOVERY REQUESTS

Because of the voluminous and broad nature of the Plaintiffs' Master Discovery Requests ("Plaintiffs' Discovery Requests"), a number of objections which apply and are appropriate in response to many of Plaintiffs' requests have been set out below. To the extent there are additional specific objections not set out below which are appropriate for an

individual request, that additional objection will be set out in full in response to the request.

Mobil objects to these discovery requests to the extent that they seek to impose an undue burden, seek discovery in violation of the attorney-client, work-product and/or investigative privileges and seek to require responses on behalf of other defendants, persons or entities. Mobil also objects to Plaintiffs' Discovery Requests to the extent that they fail to relate to the relevant time periods, job sites, working conditions, alleged injuries or products at issue in the cases in which Mobil has been sued and are therefore overly broad, unduly burdensome, misleading and do not seek discovery from Mobil which is either relevant or reasonably calculated to lead to the discovery of admissible evidence. In late 1963, Mobil Chemical Company acquired the coatings division of the Valdura Group of American Marietta and began to manufacture and sell coatings products, a limited number of which contained small amounts of non-hazardous, encapsulated chrysotile asbestos fibers until as late as 1980. Mobil sold the paint and coatings division to the Valspar Corporation in 1984. Therefore, Mobil only manufactured and sold asbestos-containing products from 1964 through 1980.

A number of Plaintiffs' Discovery Requests seek information regarding health and/or industrial hygiene studies involving Mobil employees or facilities but in no way related to the application, use and/or removal of the encapsulated asbestos-containing products manufactured or sold by Mobil or seek information outside of the time period during which Mobil manufactured and sold encapsulated asbestos-containing products. Mobil has been sued only as a manufacturer and seller of asbestos-containing products. Mobil therefore objects to those requests because they seek information unrelated to the manufacture, sale

and/or use of Mobil's asbestos-containing products and are therefore overly broad, unduly burdensome and misleading, as they apply to Mobil, and do not seek discovery from Mobil which is either relevant or reasonably calculated to lead to the discovery of admissible evidence.

A number of Plaintiffs' Discovery Requests seek information regarding "asbestos insulation products or "asbestos-containing materials." Mobil did not manufacture or sell asbestos insulation products. Rather, Mobil manufactured and sold a limited number of coatings which contained encapsulated asbestos fibers. Therefore studies or tests on non-encapsulated asbestos or asbestos containing materials are not relevant to Mobil's encapsulated products.

Mobil also objects to Plaintiffs' Discovery Requests to the extent that they would require Mobil to provide information which is equally available to Plaintiffs as to Mobil, or seek information which is in the public domain or in published medical and scientific literature.

Some of Plaintiffs' Discovery Requests call for Mobil to characterize state of knowledge or awareness of a corporation at any given time with regard to a particular fact, event or subject. Mobil can respond to such requests, if at all, only by stating on information and belief the degree of knowledge of a particular fact, event or subject as held by a person at a particular time and such response is in no way intended nor should it be deemed to constitute an acknowledgment by Mobil that such knowledge is attributable to it.

Mobil's responses are made without in any way waiving: (1) the right to object, on the grounds of competency, relevancy, materiality, hearsay or any other ground, to the use

of any such information for any purpose, in whole or in part, in any subsequent stage or proceeding in this action or any other action; or (2) the right to object on any and all grounds, at any time, to any other discovery procedure relating to the subject matter of these requests.

Mobil objects to each of Plaintiffs' Discovery Requests on the foregoing grounds and following grounds:

1. To the extent each discovery request seeks information that was prepared by the attorneys and/or agents or representatives of the attorneys representing Mobil, such information constitutes attorney work product, which is privileged from discovery.

2. To the extent each discovery request seeks information concerning any communications passing between agents or representatives of Mobil or any communications between Mobil and its agents, representatives or employees, that were made subsequent to the occurrence or transaction upon which this suit is based, and in anticipation of the prosecution or defense of the claims made a part of the pending litigation, such information is protected from discovery.

3. To the extent each discovery request seeks confidential communications made for the purpose of facilitating the rendition of legal services to Mobil (1) between Mobil or its representatives and its lawyers or its lawyers' representatives, (2) between Mobil or its representatives or its lawyers or a representative of its lawyers to a lawyer, or a representative of a lawyer representing another party in a pending action and concerning a matter of common interest therein, (3) between representatives of Mobil or between Mobil and representatives of Mobil, or (4) among lawyers or representatives representing Mobil, such communications are protected from disclosure by the attorney-client privilege.

4. All of the information and communications that are privileged and/or exempt from discovery are not included in these discovery responses and each of the following answers and responses is made subject to Mobil's general objections.

5. Mobil objects to providing information or documents concerning any product, customer or facility which is not alleged to be involved in cases in which Mobil has been sued. Plaintiffs' Discovery Requests which seek information or documents referring to products, customers or facilities which are unrelated to Plaintiffs' claims are objected to as overly broad and unduly burdensome. In addition, such requests seek information and documents which are neither relevant to the subject matter of this case nor reasonably calculated to lead to the discovery of admissible evidence as to Mobil.

6. Mobil objects to Plaintiffs' Discovery Requests because they are vague, overly broad and non-specific; do not understandably request specific information relevant to the causes of action pleaded by Plaintiffs; and do not request an identifiable item or identifiable category of documents.

INTERROGATORIES

1. Identify the registered name of answering defendant, as well as all prior names or predecessor entities by which defendant has existed.

ANSWER: For the time period during which defendant manufactured and/or sold asbestos-containing products, its name was Mobil Oil Corporation.

2. Identify all past and present divisions, subsidiaries or affiliated companies of the answering defendant, having any function which now or in the past engaged in any phase of mining, manufacturing, sale, supply, purchase, application, installation, relabeling, processing or distribution of asbestos or asbestos-containing products. With respect to each of such divisions, subsidiaries or companies, set forth with

particularity the precise relationship with the answering defendant the dates thereof, and identify the nature and extent of such functions during the relevant periods of time in which such activities have or had occurred.

ANSWER:

Defendants' asbestos-containing products were marketed by its division Mobil Chemical Company.

3. List by brand name all of your asbestos-containing products. Your asbestos-containing products includes all products which contain any amount of asbestos manufactured, sold, designed, supplied, distributed, mined, milled, re-labeled, resold, processed, applied or installed by you or for you by others. By you and yours, Plaintiffs refer to Defendant to all of your predecessors in interest, (whether by purchase, merger, consolidation or otherwise), to all of your subsidiaries, divisions, joint ventures or affiliates. As to each product, state the following:
 - a. type of product (e.g., acoustical plaster, fireproofing, etc.);
 - b. the date the product first went into production;
 - c. the last date the product was produced;
 - d. the last the product was sold;
 - e. all manufacturing locations;
 - f. dates of manufacture at each location;
 - g. the percentage of asbestos (state if percentage is by volume or weight), and the dates and all reasons for any modification thereof;
 - h. the type of asbestos;
 - i. the specific source of asbestos with dates;
 - j. the color, physical characteristic, and appearance of the product;
 - k. a full and precise description of the package in which the product was sold, including, but not limited to, type of package, size, color(s), and writings thereon;
 - l. all other names under which the product was sold;

- m. the number and dates of each patent or patent application as to the product;
- n. if the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- o. if the product is no longer produced, all reasons it was discontinued, the identify of the person who made the decision to discontinue the product was first produced without the asbestos;
- p. a precise description of your identifying logo or initials and the dates of inclusion of the product;
- q. state during what period of time such product has been associated with defendant;
- r. identify all sales literature, including brochures, advertisements, pamphlets or other material describing such product, its uses and methods of application or installation;
- s. identify any warning labels, inserts or other writings provided with such product and with every such printed warning, state what period of time it has or had accompanied the product, the exact wording of the warning, any amendments made to the wording, where the warning was located on each product or packaging, and on what asbestos products the warnings appear(ed);
- t. geographic distribution range of each such product.

ANSWER:

Mobil objects this Interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products at any of plaintiffs' alleged work sites. Mobil further objects to the scope of this series of Interrogatories, as they apply to Mobil, because they seek discovery from Mobil which is either relevant or reasonably calculated to lead to the discovery of admissible evidence. Requiring Mobil to provide detailed and exhaustive analyses of every product containing asbestos which Mobil or Mobil's "predecessors in interest," if any, "manufactured, sold, designed, supplied, distributed, mined, milled, re-labeled, resold, processed, applied or installed" seeks information far beyond

that which is relevant or reasonably calculated to lead to admissible evidence.

Notwithstanding Mobil's objection to the scope of the Interrogatory and without waiving this objection and preliminary objections, Mobil responds that it did not mine asbestos. Based upon the documents and information available to Mobil, it is not possible for Mobil to identify every company, corporate entity, concern and/or person from whom Mobil or any of its "predecessors in interest," if any, purchased asbestos. Business records relating to Mobil's Paint and Coating Division were transferred as a result of the sale of the division to the Valspar Corporation in 1984.

A review of records in Mobil's possession reveals that with respect to the asbestos-containing products marketed or manufactured by Mobil, Mobil is able to provide the following information: the brand name, the type or use of product, the type of asbestos, the date the product first went into production, the date the product was discontinued from production, the last date the product was sold and the asbestos content of the product. (No asbestos-containing products were sold after 1980). That information is provided on Exhibit "A" to these responses. The dates of manufacture or marketing relate only to Mobil's manufacture or marketing of the products. Based upon information and belief, Mobil's asbestos-containing products were manufactured at Mobil's plants in Edison, NJ, Kankakee, IL and/or Azusa, CA and/or manufactured by outside vendors.

4. Did you claim your asbestos product(s) to be safe, effective and/or easy to handle? If so, identify all documents, (sic) which have made such assertions, including, but not limited to, brochures or advertisements (radio, television or printed), and revisions thereof by publication(s) and date. Your asbestos products includes all products which contain any amount of asbestos manufactured, sold, designed, supplied, distributed, mined, milled, relabeled, resold, reprocessed, applied or installed by you or for you by others.

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. With regard to the inquiry regarding the ease of use or handling of Mobil's products, Mobil objects because this request, as it relates to Mobil, is vague and ambiguous and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to those objections and the preliminary objections, Mobil's asbestos-

containing products were safe when used for the purposes intended and according to the instructions provided for their use. Mobil has produced, with these discovery responses, product literature, relevant portions of catalogues and product safety information, bulletins, labels and material safety data sheets from which Plaintiffs' can ascertain the descriptions provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074)

5. Did you specifically inform the purchaser or user of your products at the time your product was sold, installed, used, supplied or subsequently, that your products could cause lung cancer, asbestosis, and mesothelioma? If so, identify the document containing such information by date and location.

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that Mobil's asbestos-containing products could cause lung cancer, asbestosis, and/or mesothelioma, which Mobil specifically denies. Mobil further objects to this request because it assumes that a duty to warn regarding hazards of asbestos exists for products of the type Mobil manufactured and sold, which Mobil specifically denies.

Subject to these objections, Mobil's asbestos-containing products do not cause lung cancer, asbestos or mesothelioma. A warning was provided by Mobil regarding the potential hazards associated with the inhalation of fumes while using its asbestos-containing products. Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which Plaintiffs' can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074)

6. Identify any and all labeling or relabeling agreements between answering defendant and other entities, including other Defendants concerning asbestos containing products or materials.

ANSWER: Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites.

Subject to these objections and the preliminary objections, Mobil has located no documents regarding any such labeling or relabeling agreements.

7. Have you ever mined asbestos? If so, as to each mine and type of asbestos produced there, state the following:
- a. the location;
 - b. the dates of operation by you;
 - c. the type (e.g., chrysotile, amosite, etc.) produced;
 - d. the grade of each type of asbestos fiber produced, the percentage of each grade to the total fiber produced by year or other period, and the recommended use of the grade of fiber;
 - e. the gross annual sales in dollars and in volume for each type and grade of asbestos fiber;
 - f. a full and precise description of the package in which the asbestos fiber was sold, including, but not limited to, type of package, size, color(s), and writing thereof;
 - g. all names under which the asbestos fiber was sold;
 - h. the identify of all records reflecting the sale or transfer of said asbestos fiber;
 - i. the identity of the present custodian of photographs of the burlap bags in which the asbestos fibers was stored and/or shipped;
 - j. the address of each sales office and sales region of the sale of the asbestos fiber;
 - k. the name of each authorized distributor of the asbestos fiber produced;
 - l. the identity of each owner and operator of the mine prior to the date you first began operation of the mine, and the dates thereof; and
 - m. the identity of each owner and operator of the mine subsequent to you ceasing operating of the mine.

ANSWER: Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or

around any products manufactured by Mobil at any of those plaintiffs' alleged work sites.

Subject to these objections and the preliminary objections, Mobil did not mine asbestos.

8. Is answering defendant aware of the possible connection between exposure to asbestos products and:
- a. Asbestosis?
 - b. Lung cancer, all cell types?
 - c. Mesothelioma?
 - d. Colon cancer?
 - e. Stomach cancer?
 - f. Laryngeal cancer?
 - g. Cancer of the Kidney?
 - h. Cancer of the Esophagus?
 - i. other gastrointestinal cancers?
 - j. Pneumoconiosis?

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that Mobil's asbestos-containing products could cause any of the diseases inquired of in this request, which Mobil specifically denies. Mobil's encapsulated asbestos-containing products do not cause any of the diseases listed in this Interrogatory.

Subject to those objections and the preliminary objections, Mobil responds that, prior to the 1960's, some published scientific literature reported as association between exposure to certain types of asbestos products and

asbestosis, at sufficiently high levels of exposure and sufficiently lengthy durations of exposure. During the 1960's, some published epidemiological literature reported an association between exposure to certain types of asbestos products and certain types of cancer, at sufficiently high levels of exposure and sufficiently lengthy duration of exposure. Mobil is not aware of any scientifically reliable evidence that asbestos-containing products of the type manufactured by Mobil cause any of the diseases described in this Interrogatory. Mobil further responds that any product manufactured by Mobil which contained asbestos, encapsulated the fibers in binders and adhesives so that fibers were not released in normal use, installation and/or removal and the products were therefore non-friable.

9. If your answer to the above interrogatory, as to any or all of its sub-parts, is affirmative, identify:
- a. When and how defendant first learned of such connections;
 - b. If knowledge was obtained by attendance at any conference, lecture, convention, symposium or meeting, identify such meeting and provide the identity of person attending or documents obtained;
 - c. If knowledge was obtained from medical or scientific studies, or any other published work, identify same;
 - d. If otherwise obtained, identify manner or receipt of document or communication.

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that Mobil's asbestos-containing products could cause any of the diseases inquired of in the preceding request, which Mobil specifically denies. Mobil further objects to this request because it seeks information which is equally available to Plaintiffs as to Mobil and seeks information which is in the public domain and/or in published medical and scientific literature.

Subject to those objections and the preliminary objections, Mobil responds that, prior to the 1960's, some published scientific literature reported as association between exposure to certain types of asbestos products and asbestosis, at sufficiently high levels of exposure and sufficiently lengthy

durations of exposure. During the 1960's, some published epidemiological literature reported an association between exposure to certain types of asbestos products and certain types of cancer, at sufficiently high levels of exposure and sufficiently lengthy duration of exposure. Mobil is not aware of any scientifically reliable evidence that asbestos-containing products of the type manufactured by Mobil cause any of the diseases described in this Interrogatory. Mobil further responds that any product manufactured by Mobil which contained asbestos, encapsulated the fibers in binders and adhesives so that fibers were not released in normal use, installation and/or removal and the products were therefore non-friable.

10. With regard to any knowledge obtained subsequent to that identified in the above interrogatory, and up until the time you ceased to sell and/or manufacture asbestos products, identify:
 - a. All documents or other communications, oral or written, concerning the causal connection between exposure to asbestos or asbestos products and disease, and identity (sic) of persons so communicating;
 - b. Did answering defendant obtain from or transmit any such information to other defendants in this case? If so, identify:
 1. manner of receipt or communication for each contact;
 2. all documents and persons involved.

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that Mobil's asbestos-containing products could cause any of the diseases inquired of in the preceding request, which Mobil specifically denies. Mobil further objects because, as worded, this Request invades the attorney-client and/or work product privileges.

Subject to those objections, and the preliminary objections, Mobil has produced non-privileged documents in its possession either written by or received by Mobil employees regarding the causal connection between exposure to asbestos or asbestos products and disease. The identity of the persons who were parties to those communications can be determined from those documents. (See documents Bates Labeled MOB-Harris Master 00522-

00539)

11. As to any knowledge possessed by answering defendant at any time referred to in answers to the preceding three interrogatories, did you educate your employees, distributors, or purchases about the hazards known to you and any safety precautions necessary to guard against cancer and other diseases arising from the use and handling of your asbestos-containing products? If so, identify:
- a. When and in what manner customers, insulators, nonemployee factory workers and the general public were so informed;
 - b. Documents communicating or otherwise disseminating such information;
 - c. Programs initiated or sponsored to establish or promote safety procedures, methods or usage of asbestos- containing products;
 - d. Published articles or reports by employees (present or prior), including those of medical directors, scientists, engineers or other professionals;
 - e. Symposia or lectures sponsored for the benefit of asbestos workers and/or the general public.

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that Mobil's asbestos-containing products could cause cancer or other diseases arising from the use and handling of asbestos, which Mobil specifically denies. Mobil further objects to this request because it assumes that a duty to warn regarding hazards of asbestos exists for products of the type Mobil manufactured and sold, which Mobil specifically denies.

Subject to these objections, a warning was provided by Mobil regarding the potential hazards associated with the inhalation of fumes while using its asbestos-containing products. Mobil has produced, with these discovery responses, product safety information, bulletins and material safety data sheets from which Plaintiffs' can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074)

12. When, before 1972, and by what manner were you first aware of the health hazards relating to exposure to asbestos products for insulators, plasterers, pipefitters, boilermakers, operators, sheet metal workers, helpers, drywall finishers, mechanics, carpenters, shipfitters, machinist and bystanders exposed to inhalers.

ANSWER:

Subject to preliminary objections, Mobil responds that, prior to the 1960's, some published scientific literature reported as association between exposure to certain types of asbestos products and asbestosis, at sufficiently high levels of exposure and sufficiently lengthy durations of exposure. During the 1960's, some published epidemiological literature reported an association between exposure to certain types of asbestos products and certain types of cancer, at sufficiently high levels of exposure and sufficiently lengthy duration of exposure. Mobil is not aware of any scientifically reliable evidence that asbestos-containing products of the type manufactured by Mobil cause any of the diseases described in this Interrogatory. Mobil further responds that any product manufactured by Mobil which contained asbestos, encapsulated the fibers in binders and adhesives so that fibers were not released in normal use, installation and/or removal and the products were therefore non-friable.

13. Did you perform, direct to be performed, finance, sponsor or receive the results of any studies or tests concerning potential health hazards involved with the use of asbestos containing materials? If so, identify such studies or tests and state:
- a. When, where and what intervals such studies were performed;
 - b. Were such studies in writing or reported at a later date in writing;
 - c. Were the results of such studies published or otherwise disseminated? If so, state to whom and when;
 - d. Who performed such studies;
 - e. What were the results of such studies?

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that

Mobil's asbestos-containing products created any potential asbestos related health hazards, which Mobil specifically denies. Mobil further objects to this Request because it seeks information concerning studies or tests related to the use of "asbestos-containing materials." Mobil's asbestos-containing product contained encapsulated asbestos fibers. Since Mobil's asbestos-containing products were encapsulated and did not create "friable" fibers, studies or tests on non-encapsulated asbestos or asbestos-containing materials are not relevant to Mobil's encapsulated products.

Mobil further objects to this Request because it seeks information which is in the public domain or in published medical and scientific literature, and which is therefore equally available to plaintiffs.

Subject to those objections, and the preliminary objections, Mobil did not perform, finance, sponsor or receive the results of any studies or tests concerning potential health hazards of its asbestos-containing products. However, long after asbestos was taken out of Mobil's asbestos-containing product line and that line was sold to Valspar, studies were performed by Arthur D. Little Company, Inc. to determine whether friable asbestos could be produced during the use or removal of Mobil's asbestos-containing products. Mobil has attached reports demonstrating that its asbestos-containing products were not friable during application on even extreme and atypical removal testing. (See documents Bates Labeled MOB-Harris Master 00540-00568). Mobil has also attached reports of Dr. Graham Gibbs demonstrating that Mobil's encapsulated chrysotile asbestos-containing products are of a type which has not been demonstrated to cause adverse health effects. (See documents Bates Labeled MOB-Harris Master 00075-00521).

14. During the time period that you manufactured, sold, supplied, applied, distributed or installed asbestos-containing products, what tests have been performed by any governmental agency, body, commission or health organization including, but not limited to, the U.S. Public Health Service, OSHA, or NIOSH, in your plants or on job sites owned or controlled by you concerning: specific hazards associated with the use and handling of asbestos and asbestos products; any restrictions in use of same; requirements for medical surveillance and examinations for your workers, dust monitoring or availability of safety equipment? If such findings were made, identify:
 - a. The date or dates of such findings and by which organization or entity such findings were made;
 - b. The form in which such findings were made and, if written, the exact wording of same or location in regulation, order, bulletin, report or other

writings;

- c. What steps were taken to comply with such findings and the dates when such acts of compliance occurred;
- d. How users of or bystanders exposed to asbestos or asbestos[-]containing products were informed or (sic) such findings and if such information was written identifying same:

ANSWER:

Mobil objects to this request to the extent it seeks information regarding products other than Mobil's asbestos-containing coating products, which are allegedly at issue in some of the cases in which Mobil has been sued. Mobil further objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that the application or removal of Mobil's asbestos-containing products created respirable asbestos fibers or could cause diseases arising from the use and handling of asbestos, which Mobil specifically denies. Since Mobil's asbestos-containing products were encapsulated and did not create "friable" asbestos fibers, there was no reason to perform such tests related to its products.

Subject to that objection and the preliminary objections, Mobil is aware of no such tests related to its asbestos-containing products during the time that Mobil manufactured and sold asbestos-containing products.

- 15. During the time that you manufactured, sold, designed, supplied, distributed, mined, milled, relabeled, resold, processed, applied or installed asbestos[-]containing products, did you perform, direct to be performed, finance, sponsor or receive the results of any dust monitoring tests at job sites where asbestos [-]containing products were being applied and/or removed? If so, state:
 - a. The date and location of the first such test;
 - b. When, where and at what intervals subsequent tests were performed;
 - c. Who performed such tests;
 - d. Where the results of such tests are maintained;

- e. What steps were taken by you to improve results of such tests, and dates when such improvements were made.

ANSWER:

Mobil objects to this request to the extent it seeks information regarding products other than Mobil's asbestos-containing coating products, which are allegedly at issue in some of the cases in which Mobil has been sued. Mobil further objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that the application or removal of Mobil's asbestos-containing products created respirable asbestos fibers or could cause diseases arising from the use and handling of asbestos, which Mobil specifically denies. Since Mobil's asbestos-containing products were encapsulated and did not create "friable" asbestos fibers, there was no reason to perform such tests related to its products.

Subject to that objection and the preliminary objections, Mobil is aware of no such tests related to its asbestos-containing products during the time that Mobil manufactured and sold asbestos-containing products.

16. If your answer to the above interrogatory is in the negative, state your reasons for not performing dust monitoring tests.

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that the application or removal of Mobil's asbestos-containing products created respirable asbestos fibers or could cause diseases arising from the use and handling of asbestos, which Mobil specifically denies.

Subject to those objections, since Mobil's asbestos-containing products were encapsulated and did not create "friable" asbestos fibers, there was no reason to perform such tests related to its products.

17. During the time that Defendant sold, manufactured, designed, supplied, distributed, mined, milled, relabeled, resold, processed, applied or installed asbestos[-]containing products, did the Defendant ever have any inspectors or anyone from your company

or hired by your company whose job it was to go to areas where your asbestos-containing products were being used, removed or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure and the findings and what action, if any, was taken in response to the findings, and attach results.

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that the application or removal of Mobil's asbestos-containing products created respirable asbestos fibers or could cause diseases arising from the use and handling of asbestos, which Mobil specifically denies. Since Mobil's asbestos-containing products were encapsulated and did not create "friable" or respirable asbestos fibers, there was no reason to perform such tests related to its products.

Subject to that objection and the preliminary objections, Mobil is aware of no such tests related to its asbestos-containing products during the time that Mobil manufactured and sold asbestos-containing products.

18. During the time that Defendant manufactured, sold, designed, supplied, distributed, mined, milled, relabeled, resold, processed, applied, or installed asbestos[-]containing products, identify any medical examination programs offered or sponsored by answering defendant or its insurance carrier(s) for employees of its insured handling or otherwise exposed to asbestos and asbestos products. With respect to each program: (sic) state:
- a. Manner of communication with employees about such program;
 - b. Whether examination was mandatory or optional;
 - c. What percentage of workers permitted to undergo such examination participated;
 - d. What percentage of workers were found to have asbestosis or mesothelioma;
 - e. With respect to (d), what percentage of such workers were paid disability or workmen's compensation benefits or for whose benefit medical expenses were paid to undergo treatment for such conditions.

ANSWER:

Mobil objects to this request to the extent it seeks information regarding products other than Mobil's asbestos-containing coating products, which are allegedly at issue in some of the cases in which Mobil has been sued. Mobil further objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that the application or removal of Mobil's asbestos-containing products created respirable asbestos fibers or could cause diseases arising from the use and handling of asbestos, which Mobil specifically denies. Since Mobil's asbestos-containing products were encapsulated and did not create "friable" or respirable asbestos fibers, there was no reason to perform such tests related to its products.

Subject to that objection and the preliminary objections, Mobil is aware of no such tests related to the application or removal of its asbestos-containing products during the time that Mobil manufactured and sold asbestos-containing products.

19. Does the Defendant have or has it ever had, a Medical department, and/or a research department and/or an Industrial Hygiene department(sic. If so, give the date upon which such medical department and/or Industrial Hygiene department was established, and whether or not such department has operated continuously since being established.
- a. Name each director chief or head of your Medical department and/or Industrial Hygiene Department year by year with t he (sic) first year you had a director of such department. Give the last known address of each.
 - b. State in detail the duties, responsibilities and purpose of such department(s);

ANSWER:

To the extent that this Interrogatory purports to require defendant to provide information with respect to its maintenance of a medical director or director of research and development and the duties and responsibilities of such director, defendant objects to the scope of discovery as overly burdensome and not reasonably calculated to lead to admissible evidence. Without waiving its objection, defendant states that its Medical Directors during the time period that Mobil manufactured and sold asbestos-containing products were:

T. E. Allen
1425 Treasure Cove Lane
Vero Beach, FL

H. A. Sinclair, Jr.
P. O. Box 1604
Middleburg, VA 22117

G. N. Kighlinger
P. O. Box 1038
Princeton, NJ 08543-1038

Joseph Cannella
4913 Fawn Court
Doylestown, PA 18901

20. Identify all asbestos related trade organization, associations, or other entities including, but not limited to the Gypsum Associated, Vermiculite Institute, Asbestos Textile Institute, Industrial Hygiene Foundation, Magnesia Insulation Manufacturers Association, National Insulation Manufacturers Association, Asbestos Information Association, National Insulation Contractors Association, Thermal Insulation Manufacturers Association, Quebec Asbestos Manufacturers Association, Quebec Asbestos Producers Association to which you have belonged or in which you have participated and as to each respective organization, identify the dates of membership or participation.

ANSWER:

To the extent that this Interrogatory purports to require defendant to provide information concerning all trade organizations, associations or other entities to which it belonged or in which it has ever participated, Mobil objects to the scope of such discovery as overly burdensome and not reasonably calculated to lead to admissible evidence since it manufactured and/or sold asbestos-containing products only during the time period 1964 through 1980. Based on the information and belief, Mobil was a member of the organizations listed on Exhibit "B" attached to these responses.

21. Identify all documents, not currently on file in the Master Asbestos File of Harris County, either received by you from those trade organizations, associations or other entities identified in the preceding interrogatory or else submitted by you to those trade associations, organizations or other entities that relate to any relationship between asbestos exposure and disease.

ANSWER:

Mobil objects to this Interrogatory because it seeks information related to the relationship between "asbestos exposure" and diseases. As previously set out, the asbestos-containing products manufactured or sold by Mobil contained encapsulated chrysotile asbestos fibers. Therefore, data or information on exposure to non-encapsulated asbestos, is not relevant to Mobil's encapsulated products.

Subject to those objections, Mobil has not located any such documents.

22. Identify all agreements, oral or written, between you, any of the other defendants in this lawsuit, and/or any other organizations, associations or other entities identified in your answer to Interrogatory No. 20 and/or any medical or scientific foundations, not currently on file in the master Asbestos File of Harris County, relating to the standardization of:
- a. Specifications for paper or burlap bags, or other packaging to be used for the transport and/or storage of asbestos-containing products during the time that you manufactured, sold, distributed, or applied asbestos containing products;
 - b. Warning or caution labels to be applied to asbestos products and/or their packaging, cartons, containers, or boxes during the time that you manufactured, sold, distributed, or applied asbestos-containing products;
 - c. Methods of dissemination of public relation information to defendant's purchasers, advertisers, distributors, factory workers, contractors, insulators, users, consumers of asbestos products and/or the general public pertaining to asbestos health hazards;
 - d. Safety equipment and/or protective clothing to be utilized while handling defendant's asbestos products;
 - e. Medical programs related to asbestos health hazards to be offered or sponsored by defendant.

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects to this request because it assumes that Mobil's asbestos-containing products could cause diseases arising from the

use and handling of asbestos. which Mobil specifically denies.

Subject to those objections and the preliminary objections, based on information and belief, there are no such agreements.

- 23.. Did you direct to be performed, sponsor, finance or receive the results of any studies or tests performed by the Saranac Lake Laboratory to the Trudeau Foundation relating to asbestos exposure and its effects upon human life. If so, identify:
- a. All documents summarizing findings or results of those studies or tests which you have in your possession or control;
 - b. All communications, oral or written, between answering Defendant and Saranac personnel including, but not limited to, Gerrit W.H. Schepers, M.D. and George Wilbur Wright, M.D.;
 - c. All documents relating to Saranac Studies (sic) received or submitted by you whether directly, through associated or predecessor companies, through other companies, or through trade associations, organization or other entities;
 - d. All recommendations or findings of such studies relating to:
 - 1. adequacy or inadequacy of threshold limit values;
 - 2. substitution of materials other than asbestos.
 - e. Medical programs related to asbestos health hazards to be offered or sponsored by defendant.

ANSWER:

Mobil objects to this discovery request because it seeks information related to "asbestos exposure" and its effects upon human life. The asbestos-containing products manufactured or sold by Mobil contained encapsulated chrysotile asbestos fibers. Therefore, studies, tests or data on exposure to non-encapsulated asbestos-containing materials are not relevant to Mobil's encapsulated products.

Defendant has no information indicating that it received a copy of any such studies, tests or documents or was aware of them until the 1980's when litigation involving its asbestos-containing products commenced.

24. Did you direct to be performed, sponsor, finance or receive the results of any studies or tests performed by the Sarnac lake Laboratory to the Trudeau Foundation relating

to asbestos exposure and its effects upon human life? If so, identify:

- a. All documents summarizing findings or results of those studies or tests which you have in your possession or control;
- b. All communications, oral or written, between answering defendant and Saranac personnel including, but not limited to, Gerrit W.H. Schepers, M.D. and George Wilbur Wright, M.D.;
- c. All documents relating to Saranac studies received or submitted by you whether directly, through associated or predecessor companies or through other companies, or through trade associations, organization or other entities;
- d. All recommendations or findings of such studies relating to:
 - 1. adequacy or inadequacy of threshold limit values;
 - 2. substitution of materials other than asbestos.
- e. Where documents and/or communications identified in answers to (a)-(d) of this Interrogatory are maintained.

ANSWER:

Objection, this Request is identical to Number 23, therefore, see Mobil's objections and response to Interrogatory Number 23 above.

25. Prior to December 31, 1989, has any employee of answering Defendant ever made a claim for any asbestos related disease under the Occupational Disease or Workmen's Compensation Statute of any state? If so, state:
- a. The date that Defendant first received notice of such claim;
 - b. The total number of such claims per year received to date;
 - c. The number of such claims for which disability benefits and/or medical expenses were paid by Defendant;
 - d. Identify all persons to whom disability benefits and/or medical expenses were paid by Defendant and the exact medical diagnosis, disease and/or condition for which such benefits/expenses were paid.

ANSWER:

Mobil objects to this interrogatory on grounds that, to date, there is no evidence that any plaintiff in this lawsuit has ever worked with or around any products manufactured by Mobil at any of plaintiffs' alleged work sites. Mobil further objects because this Request seeks information in no way related to the application, use and/or removal of the encapsulated asbestos-containing products manufactured or sold by Mobil and seeks information outside of the time period during which Mobil manufactured and sold encapsulated asbestos-containing products. Mobil has been sued only as a manufacturer and seller of asbestos-containing products. Mobil therefore objects to this Request because it seeks information unrelated to the manufacture, sale and/or use of Mobil's asbestos-containing products and is therefore overly broad, unduly burdensome and misleading, as it applies to Mobil, and does not seek discovery from Mobil which is either relevant or reasonably calculated to lead to the discovery of admissible evidence.

Subject to those objections and the preliminary objections, Mobil is aware of no such claim related to exposure to any asbestos-containing material manufactured or sold by Mobil.

26. Identify each and every magazine or trade publication in which answering Defendant advertised its asbestos products from 1950 until the time you ceased mining, milling, selling, distributing, and/or applying asbestos containing products.

ANSWER:

Mobil objects to this Request because it seeks information outside of the time period during which Mobil manufactured and/or sold encapsulated asbestos-containing products (1964-1980) and is therefore overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to those objections and the preliminary objections, unknown.

27. As to the person(s) answering these interrogatories, state:
- a. name;
 - b. title or position with defendant;
 - c. length of time employed by defendants.

ANSWER:

Mobil objects to this interrogatory on the grounds of the attorney-client and/or attorney-work-product privilege. Mobil further asserts that this response is not and is not intended to be, and shall in no way be deemed, a waiver of the attorney-client, or any other privilege. Subject to the foregoing and the preliminary objections, Mobil states that these responses and the information used to formulate same were compiled by employees and counsel of Mobil. The information provided was obtained primarily from review of Mobil's records. Mobil's ability to obtain all of the information requested in these interrogatories was and continues to be significantly limited because Mobil sold its former paint and coatings division to the Valspar Corporation in 1984, and the business records of the division were also transferred to Valspar at that time.

28. Have you ever sold raw asbestos fiber? If so, state the dates you were involved in the sale of raw asbestos fiber.

ANSWER:

Based on information and belief, no.

29. State whether or not you have any information as to your relative market share regarding each of your asbestos containing products. If so, as to each year between 1940 or the time that you began mining, milling, selling, distributing and/or applying asbestos[-]containing products until cessation of same, and with respect to each type of product, provide such information or opinion as to your market share and identify each document which provides any information to assist you in this determination. Give the same answers as to asbestos[-]containing products in the Texas Gulf Coast area.

ANSWER:

Mobil objects to this Interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects because this Interrogatory does not define the "market" concerning which inquiry is made. Mobil did not manufacture or sell asbestos insulation products. Rather, Mobil manufactured and sold a limited number of coatings which contained encapsulated asbestos fibers.

Subject to those objections, based on information and belief, whether the "market" about which inquiry is made is national or restricted to the Texas

Gulf Coast area, Mobil's "market share" would be *de minimus*.

30. Have you designated distributors of your asbestos-containing products in the State of Texas. If so, then state the name of all companies, their addresses, give the years that each was a designated distributor and the products each distributed.

ANSWER:

Based on information and belief, Mobil did not have designated distributors of its asbestos-containing products in the State of Texas. Mobil Chemical Company's Coatings Division had sales personnel. The Coatings Division had offices in Edison, NJ, Beaumont, TX, Kankakee, IL and Azusa, CA.

31. If you did not have designated distributors in the State of Texas, then state by what method sales of asbestos-containing materials were made. Give the name and addresses of all Defendants' sales offices, relating to asbestos-containing products, located in the State of Texas.

ANSWER:

Mobil Chemical Company's Coatings Division had sales personnel. The Coatings Division had offices in Edison, NJ; Beaumont, TX, Kankakee, IL and Azusa, CA. The addresses of those officers are reflected in the document produced with these responses. (See documents Bates Labeled MOB-Harris Master 00001-00074).

32. Did you ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER:

Based on information and belief, Mobil never had a division or subsidiary company engaged in the contracting business of applying insulation products.

33. Based upon the contents of your products, the method of manufacturing and the method of application, could or can your products be generally applied or removed without liberating asbestos fibers? Your answer may be limited to those asbestos-containing products that have been identified in any Harris County asbestos case.

1. If there is a different answer concerning different products manufactured,

sold, distributed, or used by your company then specify the different products by manufacturer's name and popular name.

2. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved;
 - a. If there is a difference in your answer depending on the trade or type worker, then specify which type workers you are referring to;

ANSWER:

In most Harris County asbestos cases in which Mobil has been sued, no Mobil asbestos-containing products have been identified by those plaintiffs who have responded to discovery. However, Mobil's asbestos-containing product could be applied or removed without liberating asbestos fibers.

34. Was it anticipated that your asbestos-containing products may have to be removed, stripped, distributed, or replaced at any time after installation?

ANSWER:

As reflected on the attached Exhibit "A", Mobil manufactured and/or sold 39 different encapsulated asbestos-containing products. Many, if not most of those products, did not need to be removed, because recoating, like repainting, could be done over the prior coating. With regard to some of Mobil's encapsulated asbestos-containing products, it would have been reasonably anticipated that, under certain circumstances and applications, those products could be removed after application.

35. Did the defendant, during the time it mined, manufactured, milled, sold or applied asbestos-containing products, give users or other persons exposed to asbestos[-]containing products or their employers who would be applying, using, removing your asbestos-containing products instructions concerning safety precautions to use in applying, using or removing such products? If so, describe such instructions, to whom they were given, the dates they were given, and the manner of giving such instructions.

ANSWER:

Mobil objects to this Interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or

around any products manufactured by Mobil at any of those plaintiffs' alleged work sites.

Subject to those objections and the preliminary objections, Mobil has produced, with these discovery responses, product safety information, bulletins, labels, and material safety data sheets from which plaintiffs' can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products.

36. If you have pled that the Plaintiff misused Defendant's asbestos-containing products, then state in what manner the defendant contends that Plaintiff misused its products? If "yes", then state in what manner and under what circumstances each product was misused. Also state what Plaintiff could have done to avoid such misuse.

ANSWER:

Subject to the preliminary objections Mobil denies that the plaintiffs here have suffered any asbestos-related injury that is in any way related to exposure to asbestos from any products manufactured by Mobil, since any product manufactured by Mobil which contained asbestos, encapsulated the fibers in binders and adhesives so that fibers were not released in normal use, application and/or removal. Very few Harris County plaintiffs have claimed to have used Mobil asbestos-containing products. However, any plaintiff who actually used Mobil's asbestos-containing products and used them in a manner inconsistent with the instructions provided with the products, would have misused the product.

37. List all the job sites, contractors and/or facilities in the Gulf Coast area of Texas, including, but not limited to, oil refineries, chemical plants, power plants, shipyards, commercial buildings, and manufacturing plants, where or to whom defendants' asbestos products were supplied, distributed sold and/or used. Also, list which products were involved, the date or time period of such sale, distribution, use or installation and if know[n], the physical location within the facility listed. Alternatively, you may produce the documents requested in Request for Production No. 1.

ANSWER:

Mobil objects to this Interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Therefore, unless and until plaintiffs identify specific job or work sites, this Request is overly broad and unduly burdensome and seeks

information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

38. For the attached list of San Antonio job sites, state whether or not Defendant's asbestos products were supplied, distributed, sold and/or used. Also, list which products were involved, the date or time period of such sale, distribution, use of installation and, if known, the physical location within the facility listed.

ANSWER:

Mobil objects to this Interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Therefore, unless and until plaintiffs identify specific job or work sites, this Request is overly broad and unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

39. Up until the time that you ceased to sell and/or manufacture asbestos-containing products, had the defendant ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust or fibers by those exposed to the use of the defendant's asbestos-containing products? If so, give the following:
- a. Name of the person or firm conducting such studies;
 - b. The date the studies began and the date completed;
 - c. Any publication or dissemination of the results of the studies;
 - d. The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers;
 - e. Attach copies.

ANSWER:

Mobil objects to this Request because Mobil manufactured and sold a limited number of coatings which contained encapsulated asbestos fibers. Therefore, studies on non-encapsulated asbestos or asbestos-containing materials are not relevant to Mobil's asbestos-containing products.

Subject to those objections and the preliminary objections, and based upon information and belief, prior to 1980, Mobil did not conduct or cause to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust or fibers by those exposed to the use Mobil's asbestos-containing products, because those products did not create friable asbestos

fibers and therefore, people using the product would not inhale asbestos fibers.

40. Has the defendant ever directly advised any person or party to whom you sell your asbestos-containing products of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienists, or mandated by any governmental entity? If so, state the date that you so advised such person or party, the manner in which you advised such person or party, and the name of each.

ANSWER:

Mobil objects to this Request because the use of its encapsulated asbestos-containing products did not create friable asbestos fibers.

Subject to that objection and the preliminary objections, Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB Harris Master 00001-00074).

41. State the year that this defendant was first advised of threshold limit values and maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee of the company receiving such information, the information received, the method of receipt of such information and attach copies of the instrument communicating such advice.

ANSWER:

Mobil stayed abreast of the relevant scientific and medical knowledge and literature, including threshold limit values and/or maximum allowable concentrations established by ACGIH for all of its products, including its encapsulated asbestos-containing products.

42. Up until the time that Defendant ceased to sell and/or manufacture asbestos-containing products, state in detail what test, if any, your company or its predecessor(s) ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which users or bystanders were exposed while using your asbestos-containing products.

- a. If there were any such tests or studies, give the name or names of the

person(s) conducting the tests, the date of the tests and attach true copies of any reports, findings or memoranda concerning such tests or studies.

ANSWER:

Mobil's asbestos-containing products. encapsulated the fibers in binders and adhesives so that fibers were not released in normal use, installation and/or removal and the use of the products did not create friable asbestos fibers.

Based on information and belief, prior to 1980, Mobil did not conduct or cause to be conducted such tests.

44. Does the Defendant possess or have in its control any written documents and/or written materials prior to 1980 which indicate that other manufacturers of asbestos-containing products had any knowledge, information, or understanding that asbestos would, could, or might be harmful? If so, list each document and/or written material, and attach a copy.

ANSWER:

Mobil objects to this Request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects because the requested information is equally available to plaintiffs.

Subject to these objections and the preliminary objections, it would have been impossible to place any warning directly on Mobil's encapsulated asbestos-containing products, because they were in the form of coatings, caulks and putty. Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074).

45. Did you company or its predecessor(s) ever place any warning directly on any of its asbestos-containing products (i.e. on insulation pipe covering itself). If so, state the wording of such warning, the size, how it was marked and the dates of placement.

ANSWER:

Mobil objects to this Interrogatory on grounds that, to date, there is no evidence that any plaintiff in this lawsuit has ever worked with or around any

products manufactured by Mobil at any of plaintiffs' alleged work sites.

Subject to these objections and the preliminary objections, it would have been impossible to place any warning directly on Mobil's encapsulated asbestos-containing products, because they were in the form of coatings, caulks and putty. Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074).

46. Did the Defendant ever provide a warning within its sales literature pertaining to the asbestos-containing products? If so, list the wording, the dates and what literature it was placed in.

ANSWER:

Yes. Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074).

47. Were any Material Safety Data sheets ever prepared by the Defendant for your asbestos products? If so, attach copies.

ANSWER:

Yes. Mobil has produced, with these discovery responses, material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00026-00036).

48. Does Defendant have insurance policies that might cover the claims made by Plaintiff in this case?

ANSWER:

Mobil believes that it has insurance policies which would provide coverage for the claims made by plaintiffs in Harris County asbestos cases in which Mobil has been sued. Mobil is in discussions with the companies who provided that insurance to determine the extent of Mobil's coverage.

49. If the answer to the above interrogatory is affirmative, please state:
- a. the amounts of insurance coverage that is (sic) currently available as of the date you answer these interrogatories, and;
 - b. how much is in dispute.

ANSWER:

See response to Interrogatory Number 48.

50. If you have not previously supplied the requested information in the Master Asbestos File, then for each and every expert witness, medical or otherwise, whom you may call to testify during the trial of this case, please state the following:
- a. Full name,
 - b. Address,
 - c. Phone number,
 - d. Each subject matter on which the expert witness is expected to testify,
 - e. The mental impressions and opinions held by the expert which relate to this case in any way, and
 - f. The facts known to the expert (regardless of when the factual information was acquired) which relate to or form the basis of the mental impression and opinions held by the expert.
 - g. Who will be paying each such expert and how much.

ANSWER:

Mobil objects to this discovery Request because it is not in accordance with the Harris County standing orders in asbestos cases. Mobil will comply with the standing orders in Harris County asbestos cases regarding the designation and testimony of expert witnesses.

51. If you have previously supplied the requested information in the Master Asbestos file, then for each expert who will be called as a witness, but whose work product forms the basis in whole or in part of the opinions of an expert who will be called as a witness, state:

- a. the name, address, and telephone number of the nontestifying expert;
- b. the subject matter of the work product on which the testifying witness will rely;
- c. the mental impression of the non-testifying expert; and
- d. the facts known to the non-testifying expert.

ANSWER:

Mobil objects to this discovery Request because it is not in accordance with the Harris County standing orders in asbestos cases. Mobil will comply with the standing orders in Harris County asbestos cases regarding the designation and testimony of expert witnesses.

52. Identify the name, address and telephone number of every person whom you intend to call as a witness at trial, who has not previously been listed as a witness in Defendant's Master Witness List on file in the Master Asbestos File.

ANSWER:

Mobil objects to this discovery Request because it is not in accordance with the Harris County standing orders in asbestos cases. Mobil will comply with the standing orders in Harris County asbestos cases regarding the designation and testimony of witnesses.

53. What is Defendant's present net worth?

ANSWER:

54. Has the Defendant, or its present directors or officers acting on its behalf, made monetary contributions in excess of \$5,000,000 within the past ten years to the following scientists or researchers who have written on the subject of asbestos-related disease or to their employing universities on behalf of or at the request of the scientist or researcher:

Raymond Murphy - Harvard Medical School and Harvard School of Public Health

Margaret Becklake - McGill University, Montreal, Canada

Edward A. Gaensler - Boston University of Medicine, Harvard Medical School, Tufts Medical School

Bernard Gee - Yale University School of Medicine

Allan Goldman - South Florida College of Medicine, Division of Pulmonary, Critical Care and Occupational Medicine

Jerome Kleinerman - Case Western Reserve University School of Medicine

Hilton Lewinsohn - University of Connecticut - Yale University

Hans Weill - Tulane University

Morton Corn - Johns Hopkins

Brooke Mossman - University of Vermont

J. Christopher Wagner

J. Corbett McDonald - McGill University

Peter Elmes

Paul E. Wheeler - Johns Hopkins

Lee Reichman - University of Medical (sic) and Dentistry of New Jersey, Newark, New Jersey

J.M.G. Davis - Institute of Occupational Medicine, Edinburg, U.K. (England)

J.N.P. Davies - Albany Medical College, New York

ANSWER:

Mobil objects to this Request because, as set out above, for a limited time, Mobil manufactured and sold a limited number of coatings which contained encapsulated asbestos fibers. Therefore, research or studies on non-encapsulated asbestos or asbestos-containing materials or any disease related to exposure to non-encapsulated asbestos or asbestos-containing materials would not be relevant to Mobil's encapsulated products.

Subject to this objection and the preliminary objections, Mobil does not have sufficient information or knowledge to provide an answer to this Interrogatory, but will supplement if it locates documents from which an answer to this question could be derived.

55. In what year did this Defendant first become aware of the 1938 Public Health Bulletin No. 241 entitled "A Study of Asbestosis in the Textile Industry"?

ANSWER:

Mobil objects to this Request because, as set out above, for a limited time, Mobil manufactured and sold a limited number of coatings which contained encapsulated asbestos fibers. Therefore, research or studies on non-encapsulated asbestos or asbestos-containing materials or any disease related to exposure to non-encapsulated asbestos or asbestos-containing materials would not be relevant to Mobil's encapsulated products.

Subject to this objection and the preliminary objections, Mobil stayed abreast of the relevant scientific and medical literature during the 1960-1980 time period during which it manufactured and sold encapsulated asbestos-containing products.

56. In what year did this Defendant first become aware of the 1946 article entitled "A Health Survey of Pipe Covering Operations in Constructing Naval Vessels by Fleischer, Drinker, et al

ANSWER:

Mobil objects to this Request because, as set out above, for a limited time, Mobil manufactured and sold a limited number of coatings which contained encapsulated asbestos fibers. Therefore, research or studies on non-encapsulated asbestos or asbestos-containing materials or any disease related to exposure to non-encapsulated asbestos or asbestos-containing materials would not be relevant to Mobil's encapsulated products.

Subject to this objection and the preliminary objections, Mobil stayed abreast of the relevant scientific and medical literature during the 1960-1980 time period during which it manufactured and sold encapsulated asbestos-containing products.

57. How many claims or lawsuits (other than workers' compensation claims) were filed against this Defendant in the 1930's alleging, in whole or in part, injury, damage or disease from exposure to or inhalation of various dusts? This interrogatory includes cases of asbestosis, pneumoconiosis and silicosis due to the fact individuals were or may have been exposed to mixed types of dusts.

ANSWER:

Mobil objects to this Request because it is not limited to the asbestos-containing products manufactured or sold by Mobil and in fact is not even limited to asbestos-containing products and is therefore, overly broad, unduly burdensome and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to this objection and the preliminary objections, litigation commenced in the 1980's against Mobil for the asbestos-containing products which it manufactured or sold. Mobil does not have sufficient information or knowledge to respond to this Interrogatory as written.

58. Has this Defendant in other litigation ever alleged or admitted that the health hazards of asbestos containing insulation products were known prior to 1945?

ANSWER:

Mobil objects to this request because it is not limited to health hazards of encapsulated asbestos-containing products of the type manufactured and sold by Mobil, it is therefore overly broad, unduly burdensome, and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to that objection and the preliminary objections, Mobil acknowledges that prior to the 1960's, some published scientific literature reported an association between exposure to certain types of asbestos products and asbestosis, at sufficiently high levels of exposure and sufficiently lengthy durations of exposure. During the 1960's, some published epidemiological literature reported an association between exposure to certain types of asbestos products and certain types of cancer, at sufficiently high levels of exposure and sufficiently lengthy duration of exposure. Mobil is not aware of any scientifically reliable evidence that asbestos-containing products of the type manufactured by Mobil cause any of the diseases described in this Interrogatory. Mobil further responds that any product manufactured by Mobil which contained asbestos, encapsulated the fibers in binders and adhesives so that fibers were not released in normal use, installation and/or removal and the products were therefore non-friable.

59. Has any employee of answering defendant ever made a claim for any asbestos related disease under the Occupational Disease or Workmen's Compensation Statute of any State? If so, state:

- a. The date that defendant first received notice of such claim;
- b. The total number of such claims per year received to date;
- c. The number of such claims for which disability benefits and/or medical expenses were paid by defendant;
- d. Identify all persons to whom disability benefits and/or medical expenses were paid by defendant and the exact medical diagnosis, disease and/or condition for which such benefits/expenses were paid.

ANSWER:

Mobil objects because this discovery request because it is not limited to claims related to the use of Mobil's asbestos-containing product. It is therefore overly broad, unduly burdensome, and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to those objections and the preliminary objections, Mobil is not aware of any claims made against it, under any occupational disease or worker's compensation statute of any state related to the alleged use of any asbestos-containing product manufactured or sold by Mobil.

- 60. Identify all of defendant's compensation, disability and/or health insurance carriers or adjusters from 1925 to the present. With respect to each, state:
 - a. Dates of coverage;
 - b. Whether defendant's insurance rates were ever increased due to health hazards associated with defendant's asbestos products and exposure of defendant's employees thereto;
 - c. Whether defendant's insurance rates were ever increased as a result of claims submitted for asbestos-related disease and/or disability;
 - d. Identify all reports, findings, studies, recommendations, communications, or other documents issued by such carriers or adjusters to defendant relating to defendant's asbestos products and hazards associated with exposure thereto.

ANSWER:

Mobil objects to this discovery request because it is not limited to claims

related to the use of Mobil's asbestos-containing product. It is therefore overly broad, unduly burdensome, and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

61. Identify each and every magazine or trade publication in which answering defendant advertised its asbestos products from 19254 (sic) to the present.

ANSWER:

Mobil objects because this discovery request because it seeks information for time periods outside of the time period during which Mobil manufactured and sold encapsulated-asbestos containing products.

Subject to those objections and the preliminary objections, unknown.

62. As to the person answering these interrogatories state:
- Name;
 - Title or position with defendant;
 - Length of time employed by defendant; and
 - State year by year all other positions, titles or jobs that person has held with defendant.

ANSWER: Mobil objects to this interrogatory on the grounds of the attorney-client and/or attorney-work-product privilege. Mobil further asserts that this response is not and is not intended to be, and shall in no way be deemed, a waiver of the attorney-client, or any other privilege. Subject to the foregoing and the preliminary objections, Mobil states that these responses and the information used to formulate same were compiled by employees and counsel of Mobil. The information provided was obtained primarily from review of Mobil's records. Mobil's ability to obtain all of the information requested in these interrogatories was and continues to be significantly limited because Mobil sold its former paint and coatings division to the Valspar Corporation in 1984, and the business records of the division were also transferred to Valspar at that time.

63. Have you ever sold raw asbestos fiber? If so, state the dates you were involved in the sale of raw asbestos fiber and describe the circumstances of your involvement.

ANSWER:

Mobil objects to this discovery request because it is duplicative of

interrogatory number 28.

Based on information and belief, no.

64. State whether or not you have any information as to your relative market share regarding each of your asbestos [-]containing products. If so, as to each year and with respect to each type of product, or any subdivisions thereof, provide such information or opinion to your market share, and identify each document which provides any information to assist you in this determination.

ANSWER:

Mobil objects to this discovery request because it is duplicative of interrogatory number 29. Mobil objects to this Interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects because this Interrogatory does not define the "market" concerning which inquiry is made. Mobil did not manufacture or sell asbestos insulation products. Rather, Mobil manufactured and sold a limited number of coatings which contained encapsulated asbestos fibers.

Subject to those objections, based on information and belief, whether the "market" about which inquiry is made is national or restricted to the Texas Gulf Coast area, Mobil's "market share" would be *de minimus*.

65. List by name and address all of the suppliers and/or distributors of your asbestos-containing products, the applicable years of distribution in Texas, and the products distributed.

ANSWER:

Mobil objects to this discovery request because it is duplicative of interrogatory number 30.

Based on information and belief, Mobil did not have designated distributors of its asbestos-containing products in the State of Texas. Mobil Chemical Company's Coatings Division had sales personnel. The Coatings Division had offices in Edison, NJ, Beaumont, TX, Kankakee, IL and Azusa, CA.

66. Have you designated distributors of your asbestos-containing products in the State of Texas? If so, then state the name of all companies, their addresses, give the years that each was a designated distributor and the products each distributed.

ANSWER:

Mobil objects to this discovery request because it is duplicative of interrogatory number 30.

Based on information and belief, Mobil did not have designated distributors of its asbestos-containing products in the State of Texas. Mobil Chemical Company's Coatings Division had sales personnel. The Coatings Division had offices in Edison, NJ, Beaumont, TX, Kankakee, IL and Azusa, CA.

67. If you did not have designated distributors in the State of Texas, then state by which method sales of asbestos-containing materials were promoted, encouraged, and consummated. Give the name and addresses of all of Defendant's sales offices located in the State of Texas.

ANSWER:

Mobil objects to this discovery request because it is duplicative of interrogatory number 31.

Mobil Chemical Company's Coatings Division had sales personnel. The Coatings Division had offices in Edison, NJ, Beaumont, TX, Kankakee, IL and Azusa, CA.

68. Did your company or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of applying insulation products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contract business.

ANSWER:

Mobil objects to this discovery request because it is duplicative of interrogatory number 32.

Based on information and belief, Mobil never had a division or subsidiary company engaged in the contracting business of applying insulation products.

69. Were each of your asbestos-containing products expected to reach, or were packaged to reach the consumer or user, without substantial change in the condition in which it was sold?

ANSWER:

Yes.

70. If your answer to the above interrogatory is "No", with respect to each product, explain in what way the defendant claims its products were altered or substantially changed after sale or distribution and before reaching the ultimate user.

ANSWER: Not applicable.

71. Did you admit that the following types of workers, including but not limited to, asbestos insulation applicators, helpers, drywall finishers, mechanics, laborers, carpenters, plasterers, latherers, boilermakers, pipefitters, shipfitters, operators, electricians, sheetmetal workers, welders, iron workers and machinists and all other trades represented by the Plaintiffs' attorney for asbestos disease were foreseeable users of defendant's asbestos[-]containing products?

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those Plaintiff's work sites.

Subject to this objection and the preliminary objections, no.

72. Based upon the material contents of your products, the method of manufacturing, and the method of application, could or can your products be generally applied or removed by the workers listed in the above interrogatory, without liberating asbestos fibers?
- a. If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by exact manufacturers name and popular name.
 - b. If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the years involved.
 - c. If there is a difference in your answer depending on the trade or type worker, then specify which type workers you are referring to.

ANSWER:

Mobil objects to this discovery request because it is duplicative of interrogatory number 33. Mobil further objects because all of the types of workers listed in Interrogatory 71 would not be foreseeable users of its asbestos-containing products.

Subject to those objections and the preliminary objections, Mobil's asbestos-containing product could be applied or removed without liberating asbestos fibers.

73. Was it a foreseeable use of your asbestos[-]containing products that they may have to be removed, stripped, disturbed, or replaced at any time after installation.

ANSWER:

Mobil objects to this discovery request because it is duplicative of interrogatory number 34.

~~Subject to those preliminary objections, Mobil objects to this request because it is duplicative of Exhibit "A", Mobil's Exemption 19 offer~~
encapsulated asbestos-containing products. Many, if not most of those products, did not need to be removed, because recoating, like repainting, could be done over the prior coating. With regard to some of Mobil's encapsulated asbestos-containing products, it would have been reasonably anticipated that, under certain circumstances and applications, those products could be removed after application.

74. Did the defendant ever at any time give insulation contractors, mechanics, helpers, or other users listed in question 49 or their employers who would be applying, using, or removing your asbestos-containing product instructions concerning safety precautions to use in applying such products? If so, describe such instructions, to whom they were given, the dates they were given, and the manner of giving such instructions.

ANSWER:

Mobil assumes that this interrogatory refers to interrogatory number 71, rather than number 49. Mobil objects to this request because it incorrectly assumes that all the types of workers listed in Interrogatory number 71, would be typical and foreseeable users of Mobil's encapsulated-asbestos containing products.

Subject to those objections and the preliminary objections, Mobil has produced with these discovery responses, product safety information,

bulletins, labels, material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074).

75. Does the defendant contend that Plaintiff misused its products? If "Yes", then state in what manner and under what circumstances each product was misused. Also state what Plaintiff could have done to avoid such misuse.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 36.

Subject to the preliminary objections Mobil denies that the plaintiffs here have suffered any asbestos-related injury that is in any way related to exposure to asbestos from any products manufactured by Mobil, since any product manufactured by Mobil which contained asbestos, encapsulated the fibers in binders and adhesives so that fibers were not released in normal use, application and/or removal. Very few Harris County plaintiffs have claimed to have used Mobil asbestos-containing products. However, any plaintiff who actually used Mobil's asbestos-containing products and used them in a manner inconsistent with the instructions provided with the products, would have misused the product.

76. Did Defendant manufacture, supply, distribute and/or sell asbestos-containing products to the shipbuilding industry in the Texas Gulf Coast area? If "Yes", please indicate or list which shipbuilding company, yard, corporation, and/or contractor said products were supplied to, the product supplied and the years in which those products were supplied.

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiff's alleged work sites. Unless and until plaintiffs identify Mobil asbestos-containing products, this interrogatory is overly broad, unduly burdensome, and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to those objections and the preliminary objections, on information and belief Mobil's asbestos-containing products would not be typically sold to the shipbuilding industries in the Texas Gulf Coast area.

and belief Mobil's asbestos-containing products would not be typically sold to the shipbuilding industries in the Texas Gulf Coast area.

77. List all the job sites and/or facilities in the Coast area of Texas, including, but not limited to, oil refineries, chemical plants, power plants, commercial building, and manufacturing plants, where defendant's asbestos products were supplied, distributed, sold and/or used. Also, list which products were involved, the date or time period of such sale, distribution, use or installation and[,] if known, the physical location within the facility listed.

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiff's alleged work sites. Unless and until plaintiffs identify Mobil asbestos-containing products, this interrogatory is overly broad, unduly burdensome, and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

78. List all the job sites and/or facilities in the San Antonio area of Texas, including, but not limited to oil refineries, chemical plants, power plants, military facilities, commercial buildings, and manufacturing plants, where defendant's asbestos products were supplied, distributed, sold and/or used. Also, list which products were involved, the date or time period of such sale, distribution[,] use or installation and[,] if known, the physical location within the facility listed.

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiff's alleged work sites. Unless and until plaintiffs identify Mobil asbestos-containing products, this interrogatory is overly broad, unduly burdensome, and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

79. Did the defendant install for, manufacturer for, supply to, an[d]/or sell asbestos containing products to the United States Navy, United States Military, United States Coast Guard, and/or Merchant Marines? If so, state:
- a. List types and names of products;

- b. Dates of manufacture, supply, installation and/or sale;
- c. Intended use of such products; and
- d. Specific place of use or installation of such products.

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiff's alleged work sites.

Subject to those objections and the preliminary objections, on information and belief, no.

80. Have any written materials of any kind or character been prepared by defendant or its predecessor or any of its subsidiary companies of the agents indicating how asbestos products should be used and maintained? If so, state:
- a. List each written material or document;
 - b. Who presently has possession of each such document; and
 - c. Where it is located.

ANSWER:

Mobil objects to this request to the extent that there is no evidence that any plaintiff in the case in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiff's alleged work sites.

Subject to that objection and the preliminary objections, Mobil has produced with these discovery responses, products safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074).

81. Has the defendant ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust or fibers by those exposed to the use of the defendant's asbestos-containing products? If so, give the following:

- a. name of the person or firm conducting such studies;
- b. The date the studies began and the date completed;
- c. Any publication or dissemination of the results of the studies;
- d. The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers;
- e. Attach copies.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 39. Mobil also objects to this Request because Mobil manufactured and sold a limited number of coatings which contained encapsulated asbestos fibers. Therefore, studies on non-encapsulated asbestos or asbestos-containing materials are not relevant to Mobil's asbestos-containing products.

Subject to those objections and the preliminary objections, and based upon information and belief, prior to 1980, Mobil did not conduct or cause to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust or fibers by those exposed to the use Mobil's asbestos-containing products, because those products did not create friable asbestos fibers and therefore, people using the product would not inhale asbestos fibers.

82. Has the defendant ever directly advised any person or party to whom you sell your asbestos[-]containing products of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienists, or mandated by any governmental entity? If so, state the date that you so advised such person or party, the manner in which you advised such person or party, and the name of each.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 40. Mobil also objects to this Request because the use of its encapsulated asbestos-containing products did not create friable asbestos fibers.

Subject to that objection and the preliminary objections, Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain the product

hazard and warning information provided Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074).

83. Did your company or its predecessor(s) ever make any industrial hygiene surveys? If so, give the date of such surveys, who made such surveys, the results of such surveys, purpose of such surveys, and the name of the person who authorized such surveys.

ANSWER:

Mobil objects to this request because it is not limited to the asbestos-containing products manufactured or sold by Mobil, or the time period during which Mobil manufactured or sold such products. It is therefore, overly broad, unduly burdensome, and seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This request is so broad and burdensome that it is impossible to answer as written.

84. State the year that this defendant was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee-official of the company receiving such advice[,] the method of receipt of such information and attach copies of the instrument communication (sic) such advice.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 41.

Subject to that objection and the preliminary objections, Mobil stayed abreast of the relevant scientific and medical knowledge and literature, including threshold limit values and/or maximum allowable concentrations established by ACGIH for all of its products, including its encapsulated asbestos-containing products.

85. Was such threshold limit values or maximum allowable concentrations inquired about in the preceding interrogatory Total (sic) dust and not just asbestos dust?

ANSWER:

Mobil objects to this interrogatory because the asbestos-containing products

manufactured and sold by Mobil encapsulated the asbestos fibers in binders and adhesives and therefore no friable asbestos fibers were created by the use of those products. Therefore, this request, as it relates to Mobil, seeks information which is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

86. State in detail what test, if any, your company or its predecessor(s) ever made with regard to the quantity, quality, or threshold limit values of asbestos dust or particles to which users or bystanders were exposed while using your asbestos-containing products.
- a. If there were any such tests or studies, give the name or names of the person(s) conducting the tests, the date of the tests and attach true copies of any reports, findings or memoranda concerning such tests or studies.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 42.

Subject to that objection and the preliminary objections, Mobil's asbestos-containing products, encapsulated the fibers in binders and adhesives so that fibers were not released in normal use, installation and/or removal and the use of the products did not create friable asbestos fibers.

Based on information and belief, prior to 1980, Mobil did not conduct or cause to be conducted such tests.

87. Does defendant possess or have in its control any written documents and/or written materials which indicate when other manufacturers of asbestos[-]containing products first had knowledge, information, or understanding that asbestos would, could or might be harmful? If so, state:
- a. List each document and/or written material;
- b. Who presently has possession of such document;
- c. Where is it located; and
- d. The date manufacturer that (sic) gained such knowledge and when such knowledge was obtained.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 44. Mobil also objects to this Request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects because the requested information is equally available to plaintiffs.

Subject to these objections and the preliminary objections, it would have been impossible to place any warning directly on Mobil's encapsulated asbestos-containing products, because they were in the form of coatings, caulks and putty. Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00001-00074).

88. What health risks or dangers are their associated with inhalation of dust or fibers from your asbestos or asbestos products? Please state:
- a. How your product causes such risks or danger;p (sic)
 - b. When you first became aware of such risks or dangers;
 - c. What action(s) were taken as a result of such knowledge; and
 - d. When was/were such action(s) taken.

ANSWER:

Mobil did not mine or sell asbestos. There were no health risks or dangers associated with inhalation of dust or fibers from Mobil's encapsulated asbestos-containing products. Mobil has attached reports demonstrating that its asbestos-containing products were not friable during application on even extreme and atypical removal testing. (See documents Bates Labeled MOB-Harris Master 00540-00568). Mobil has also attached reports of Dr. Graham Gibbs demonstrating that Mobil's encapsulated chrysotile asbestos-containing products are of a type which has not been demonstrated to cause adverse health effects. (See documents Bates Labeled MOB-Harris Master 00075—00521).

89. What steps were taken by Defendants once Defendant learned of the possible harmful effects of asbestos exposure to protect customers, workers, or users working with or around Defendant's products.

ANSWER:

Mobil objects to this request because it assumes that there any possible harmful affects of asbestos exposure to users working with or around Mobil's encapsulated asbestos-containing products. There are no harmful affects from asbestos fibers arising from the use of Mobil's encapsulated asbestos-containing products.

90. Did the Defendant ever place any warning signs on the containers in which asbestos-containing products were packaged?

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiff's alleged work site.

Subject to those objections and the preliminary objections, Mobil has produced, with these discovery responses, labels from which plaintiff's can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00015-00025).

91. If you have answered the above Interrogatory number 68 in the affirmative, please state:
- a. On what date did the defendant issue an order directing a warning be placed on the insulation products or containers?
 - b. On what date was such warning actually first placed on such products or containers?
 - c. On what date did your asbestos[-]containing products accompanied by such warning, first reach the insulation contractor, insulation contract locatio (sic) or facility, or ultimate user?

- d. State the exact wording of the first warning;
- e. State the exact size and location of the warning printed on your asbestos[-]containing products or container.
- f. Did your company, or its predecessor(s) place such warning on your asbestos[-]containing products or containers?
- g. Did your company or its predecessor (s) place such warning on your asbestos[-]containing products or containers because you received a directive, command, suggestion, legal opinion or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, attorney or institute? If so, what, from whom and on what date did you receive such directive, command, suggestion, legal opinion, or other type of communication?
- i.(sic) If the wording size or location of the warning has ever been changed or altered, state when it was changed, and the exact change in the wording, size or location.

ANSWER:

Mobil objects to this interrogatory to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiff's alleged work sites. Mobil further objects to this request to the extent that it invades the attorney client and/or work product privileges.

Subject to those objections and the preliminary objections, the responsive, non-privileged information which is in Mobil's possession can be ascertained from the products safety information, bulletins, labels and material safety data sheets which Mobil has produced with these discovery responses. (See documents Bates Labeled MOB-Harris Master 00001-00074).

- 92. Did your company or its predecessor (s) ever place any warning directly on any of its asbestos-containing products (i.e. on insulation pipe covering itself). If so, state the wording of such warning, the size, how it was marked and the dates of placement.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 45.

Subject to these objections and the preliminary objections, it would have been impossible to place any warning directly on Mobil's encapsulated asbestos-containing products, because they were in the form of coatings, caulks and putty Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products.

93. Did the Defendant ever provide a warning within its sales literature pertaining to asbestos-containing products? If so, list the wording, the dates and what literature it was placed in.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 46.

Subject to that objection and the preliminary objections, yes. Mobil has produced, with these discovery responses, product safety information, bulletins, labels and material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products.

94. Prior to 1964, did the Defendant ever manufacture insulation and/or other asbestos-containing products without a warning? If so, list the years.

ANSWER:

No.

95. After 1964, did the Defendant ever manufacture insulation and/or other asbestos-containing products without a warning? If so, list the name of the product and the years.

ANSWER:

Mobil objects to this request because it did not manufacture asbestos-containing insulation. Mobil further objects because the use of its encapsulated asbestos-containing products did not create harm.

Subject to those objections and the preliminary objections, to the best of Mobil's knowledge and information, Mobil provided a warning, which has been produced with these discovery responses with all of its asbestos-

containing products.

96. Does the Defendant possess or have in its control any documents and/or written materials which indicate when other manufacturers of asbestos-containing products began issuing warnings associated with the use of their products? If so, state:
- a. List each document and/or written material;
 - b. Who presently has possession or control of such document; and
 - c. Where is it located; and
 - d. The Defendant's understanding when other such manufacturers started such warning, the reason for same and the content of the warning.

ANSWER:

Mobil objects to this request because it is duplicative of interrogatory number 44. Mobil objects to this Request to the extent that there is no evidence that any plaintiff in the cases in which Mobil has been sued ever worked with or around any products manufactured by Mobil at any of those plaintiffs' alleged work sites. Mobil further objects because the requested information is equally available to plaintiffs.

97. Were any Material Safety Data Sheets ever prepared by the Defendant for your asbestos products? If so, attach copies.

ANSWER:

Mobil objects to this request because it is duplicative of Interrogatory No. 47.

Yes. Mobil has produced, with these discovery responses, material safety data sheets from which plaintiffs can ascertain the product hazard and warning information provided by Mobil regarding its asbestos-containing products. (See documents Bates Labeled MOB-Harris Master 00026-00036).

98. Does Defendant have insurance policies that might cover the claims made by Plaintiff in this case?

ANSWER:

Mobil objects to this discovery request because it is duplicative of Interrogatory number 48.

Mobil believes that it has insurance policies which would provide coverage for the claims made by plaintiffs in Harris County asbestos cases in which Mobil has been sued. Mobil is in discussions with the companies who provided that insurance to determine the extent of Mobil's coverage.

99. If the answer to the above Interrogatory number 76 is affirmative, list the name of each insurance carrier, the amount of coverage, the amount remaining in such coverage, any disputes to such coverage and the effective date of each policy.

ANSWER:

Mobil objects to this request because it is duplicative of Interrogatory No. 49.

See response to Interrogatories No. 48 and 98.

100. With respect to each expert witness whom you have consulted whose testing, findings, or conclusions will form a basis for any experts testifying at trial, or whom you may call as an expert witness at trial of this case, please give the name and business of each such expert, the field or profession of each such expert, the subject matter on which each such expert is expected to testify, the substance of the opinions to which he is expected to testify, and a summary of the grounds for such opinion including the substance of the facts.

ANSWER:

Mobil objects to this request because it is duplicative of Interrogatory No. 50.

Mobil objects to this discovery Request because it is not in accordance with the Harris County standing orders in asbestos cases. Mobil will comply with the standing orders in Harris County asbestos cases regarding the designation and testimony of expert witnesses.

101. State the name, address, and telephone number of any persons having knowledge of any facts, (sic) relevant to any issue in this lawsuit.

ANSWER:

Mobil objects to this request because it is duplicative of Interrogatory No. 52.

Mobil objects to this discovery Request because it is not in accordance with the Harris County standing orders in asbestos cases. Mobil will comply with the standing orders in Harris County asbestos cases regarding the designation and testimony of witnesses.

102. What is Defendant's net worth?

ANSWER:

Mobil objects because this request is duplicative of Interrogatory No. 53.

EXHIBIT "A"

- a. Name: 35-J-13 Asgum Roof Coating Liquid
 Type: Waterproofing for roof
 Date of Production: 1964
 Date of Discontinuation: October 1980
 Last Date Sold: Unknown
 Asbestos Fiber Content: 4-10% chrysotile asbestos
2. Name: 35-J-14 Asgum Roof Coating Plastic
 Type: Waterproofing for roof
 Date of Production: 1964
 Date of Discontinuation: October 1980
 Last Date Sold: Unknown
 Asbestos Fiber Content: 5-14% chrysotile asbestos
3. Name: 35-J-702 Asgum Roof Coating Plastic
 Type: Waterproofing for roof
 Date of Production: October 1966
 Date of Discontinuation: 1980
 Last Date Sold: Unknown
 Asbestos Fiber Content: 15% chrysotile asbestos
4. Name: 35-J-807 Fibrated Asphaltic Roof Coating
 Type: Roof Coating Mastick
 Date of Production: June 1964
 Date of Discontinuation: October 1980
 Last Date Sold: Unknown
 Asbestos Fiber Content: 15% chrysotile asbestos
5. Name: 35-A-701 Asphalt Aluminum Fiber Coating
 Type: Waterproof and finish of roofing surfaces
 Date of Production: October 1965
 Date of Discontinuation: 1980
 Last Date Sold: Unknown
 Asbestos Fiber Content: 10% chrysotile asbestos

6. Name: 35-A-702 Asphalt Aluminum Fiber Coating
Type: Waterproof and finish of roofing surfaces
Date of Production: June 1967
Date of Discontinuation: February 1975
Last Date Sold: Unknown
Asbestos Fiber Content: 10% chrysotile asbestos
7. Name: 35-J-8 Gilomastic
Type: Automotive rust proofing
Date of Production: 1964
Date of Discontinuation: July 1979
Last Date Sold: Unknown
Asbestos Fiber Content: 10-14% chrysotile asbestos
8. Name: 46-F-5 Dum Dum Caulking
Type: Caulking compound (putty consistency)
used for glazing and filling applications by
putty knife and caulking gun
Date of Production: 1964
Date of Discontinuation: January 1979
Last Date Sold: Unknown
Asbestos Fiber Content: 2-3 % chrysotile asbestos
8. Name: 46-F-7 Hi-Heat Dum Dum
Type: Caulking material (mastic consistency) used for sealing
joints and crevices on furnaces and boilers applicable only
with caulking gun, trowels, special Dum Dum brush or heavy
duty mastic spray equipment.
Date of Production: 1964
Date of Discontinuation: October 1980
Last Date Sold: Unknown
Asbestos Fiber Content: 10-13% chrysotile asbestos
9. Name: 46-F-3 Dum Dum Caulk Gun-Grade
Type: Caulking compound (putty consistency for application
by caulking gun)
Date of Production: 1964
Date of Discontinuation: August 1969
Last Date Sold: Unknown
Asbestos Fiber Content: 10% chrysotile asbestos
10. Name: 46-F-6 Dum Dum Caulk
Type: Caulking compound (putty consistently for application
by caulking gun but supplied in unspouted cartridges)

Date of Production: 1964
Date of Discontinuation: 1969
Last Date Sold: Unknown
Asbestos Fiber Content: 10% chrysotile asbestos

11. Name: 44-W-3 Dum Dum Caulk
Type: Mastick - (similar to 46-F-3, but off white in color)
Date of Production: 1964
Date of Discontinuation: 1969
Last Date Sold: Unknown
Asbestos Fiber Content: Unknown
12. Name: 46-W-4 Dum Dum Cartridge Caulk: off white
Type: Mastick - (same as 46-W-3 but supplied in unspouted cartridges)
Date of Production: 1964
Date of Discontinuation: 1968
Last Date Sold: Unknown
Asbestos Fiber Content: Unknown
13. Name: 46-W-5 Dum Dum Cartridge Caulk
Type: Mastick - (same as 46-W-3 but supplied in nozzle cartridges)
Date of Production: 1964
Date of Discontinuation: 1969
Last Date Sold: Unknown
Asbestos Fiber Content: Unknown
14. Name: 46-X-9 Heating and Ventilating Dum Dum
Type: Mastick - Caulking material for sealing joints on air ducts in heating and air conditioning systems-a heavy putty-type consistency for knife or trowel application
Date of Production: 1964
Date of Discontinuation: 1969
Last Date Sold: Unknown
Asbestos Fiber Content: Unknown
15. Name: 569-N-1343 Nail Hole Dum Dum
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos

16. Name: 77-740 Dum Dum Nail Hole: Allspice
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
17. Name: 77-739 Dum Dum Nail Hole Dark Walnut
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
18. Name: 77-171 Dum Dum Nail Hole Natural Walnut
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
19. Name: 77-742 Dum Dum Nail Hole Natural Walnut
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
20. Name: Dum Dum Travatine White
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
21. Name: 77-916 Black Putty
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood

Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos

22. Name: Mahogany Dum Dum
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
23. Name: Dum Dum Super White
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
24. Name: 77-539 Dum Dum Nail Hole Lt. Luan
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
25. Name: Dum Dum Nail Hole Walnut
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
26. Name: #171 Dum Dum Nail Hole White
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos

27. Name: #739 Dum Dum Nail Hole Dark Walnut
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
28. Name: #742 Dum Dum Nail Hole Natural Walnut
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
29. Name: 569-W-1379 Dum Dum Nail Hole Bone White
Type: material of putty-like consistency for knife application to fill nail holes in prefinished wood
Date of Production: Unknown
Date of Discontinuation: 1973
Last Date Sold: Unknown
Asbestos Fiber Content: 2% chrysotile asbestos
30. Name: 95 Series Dum Dum Masonic
Type: Mastick - a heavy bodied coating designed for hi-build application and for bridging cracks and crevices with application
By trowel, special brush or heavy-duty mastic spray equipment
Date of Production: 1964
Date of Discontinuation: 1979
Last Date Sold: Unknown
Asbestos Fiber Content: 12-15% chrysotile asbestos
31. Name: 97 Series Chimney Dum Dum
Type: Mastick - a heavy bodied coating designed for hi-build application and for bridging cracks and crevices with application
By trowel, special brush or heavy-duty mastic spray equipment
Date of Production: 1964
Date of Discontinuation: 1979
Last Date Sold: Unknown
Asbestos Fiber Content: 4-5% chrysotile asbestos

32. Name: 46-J-9 Armorcote
Type: Mastick - a heavy bodied product for refractory application by trowel.
Date of Production: 1964
Date of Discontinuation: January 1979
Last Date Sold: Unknown
Asbestos Fiber Content: 5-6 % chrysotile asbestos
33. Name: 35-J-1631 Heavy Fibrous Coating Black
Type: Mastick
Date of Production: 1952
Date of Discontinuation: 1964
Last Date Sold: Unknown
Asbestos Fiber Content: Unknown
34. Name: 35-J-1212 Fibrous Coating Black
Type: Roof Coating
Date of Production: 1952
Date of Discontinuation: 1964
Last Date Sold: Unknown
Asbestos Fiber Content: Unknown
35. Name: 35-J-1000 Bituminous Black
Type: Used mainly for interior of crude oil tank
Date of Production: 1951
Date of Discontinuation: 1964
Last Date Sold: Unknown
Asbestos Fiber Content: Unknown
36. Name: 90 Series Mobiltex Coatings
Type: Heavy bodied texture-type material
Date of Production: 1965
Date of Discontinuation: 1970
Last Date Sold: Unknown
Asbestos Fiber Content: 5% chrysotile asbestos
37. Name: 11-A-817 Aluminum Asbestos Fibered Coating
Type: Mastick
Date of Production: August 1971
Date of Discontinuation: October 1980
Last Date Sold: Unknown
Asbestos Fiber Content: 5% chrysotile asbestos
38. Name: 79-W-8 Latex Block Filler
Type: Heavy bodied polyvinyl acetate product

Date of Production: 1964
Date of Discontinuation: April 1978
Last Date Sold: Unknown
Asbestos Fiber Content: 2-3 % chrysotile asbestos

EXHIBIT "B"

American Petroleum Institute

American Congress of Governmental Industrial Hygienists

American Industrial Hygiene Association

American Medical Association

National Safety Council

Industrial Hygiene Foundation of America

American Academy of Occupational Medicine

American Board of Industrial Hygiene

American Chemical Society

American Industrial Hygiene Association (AIHA)

American Industrial Hygiene Association, Gulf Coast Chapter

American Institute of Chemical Engineers

American Institute of Industrial Engineers .

American Society of Safety Engineers

American Society of Testing Material (ASTM)

Air Pollution Control Association

Board of Certified Safety Professionals

Texas Chemical Council

Chemical Manufacturers Association

Texas Association of Business

National Petroleum Council

Mid-Continental Oil & Gas Association

National Ocean Industries
Paleontological Research Institution
Asphalt Institute
Canadian Fertilizer Institute
Chemical Specialties Manufacturers Association
Division of Polymer Chemistry, Inc.
Fertilizer Institute
Fire Retardant Chemicals Association
Florida Phosphate Council
International Superphosphate and Compound Manufacturing
Association, Ltd.
Manufacturing Chemists Association
Midwest Agricultural Chemical Association
National Agricultural Chemicals Association
National Chemical Credit Association
National Fertilizers Solutions Association
Pesticide Division of the American Chemical Society
Plastics Institute of America, Inc.
Society of the Plastics Industry, Inc. (Urethane Division)
Southern Agricultural Chemicals Association
Texas Agricultural Chemicals Association
American Inc. Health Council
Intl. Petroleum Industry Environmental Conservation

Association

Energy Research and Education Foundation

Rocky Mountain Mineral Law Foundation

Rocky Mountain Oil & Gas Association

Texas Mid-Continent Oil & Gas Association

Western Oil & gas Association

New Mexico Oil & Gas Association

Alaska Oil & Gas Association

Illinois Oil & Gas Association

Michigan Oil & Gas Association

Mid-Continent Oil & Gas Association, Kansas/Oklahoma

Division

Oklahoma Petroleum Council

Pacific Energy Association (formerly Western Gas Processors)

Gas Processors Association

Alaska Miners Association

American Mining Congress

Colorado Mining Association

Illinois Coal Association

Montana Coal Association

Montana Mining Association

Mountain States Employers Council

National Coal Association

New Mexico Mining Association

New Mexico Mining Association-Uranium Environmental

Subcommittee

North Dakota Lignite Council

Northwest Mining Association

ORC Mine Safety and Health Group

Rocky Mountain Oil & Gas Association-Oil Shale

Texas In Situ Uranium Mining Environmental Association

Western Environmental Trade Association

Wyoming Mining Association

Independent Natural Gas Association of America, Natural

Gas Supply Committee

Association of Oil Pipelines

Empire State Petroleum Association

Independent Oil Compounders Association

Maine Oil Dealers Association

Midwest Petroleum Marketers Association

National LP Gas Association

National Petroleum Refiners Association

Nebraska Petroleum Council

N. J. Fuel Merchants Convention Trade Show

Oil Heat Institute of Washington

Pacific Energy Association

Pacific Oil Institute

Petroleum Marketing Education Foundation

South Dakota Petroleum Council

Texas LP Gas Association

Virginia Gasoline Retailers Association

Western Environmental Trade Association