

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

ELDON CLAUDE DICKERSON
AND RUTH VIRGINA DICKERSON,

Plaintiffs,

-VS-

A-BEST PRODUCTS COMPANY, ET AL.,

Defendants.

: CASE NO. 398302

: (JUDGE HARRY A. HANNA)

RESPONSES TO

**PLAINTIFFS' MASTER SET OF INTERROGATORIES PROPOUNDED TO
F. D. LAWRENCE ELECTRIC COMPANY**

TO: F. D. LAWRENCE ELECTRIC COMPANY, by and through its attorney of record,
William F. Gibson, Gallagher, Sharp, Fulton & Norman, Sixth Floor-Bulkley Building,
1501 Euclid Avenue, Cleveland, OH 44115.

F. D. Lawrence Electric Company ("Defendant") is hereby requested to answer under oath
the interrogatories numbered 1 to 58, inclusive, as set forth below, within twenty-eight (28) days
of the time service is made upon Defendant, in accordance with Ohio Civil Rule 33.

INSTRUCTIONS

1. Answer each interrogatory separately and fully in writing under oath, unless it is
objected to, in which event the reasons for objection must be stated in lieu of answer.

2. An evasive or incomplete answer is deemed to be a failure to answer under Ohio
Civil Rule 37(A).

3. Defendant is under a continuing duty to seasonably supplement its response with
respect to any question directly addressed to the identity and location of persons having
knowledge of discoverable matters, and the identity of each person expected to be called as an

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expert witness at trial and the subject matter on which he or she is expected to testify.

Furthermore, Defendant, pursuant to Rule 26(E) of the Ohio Rules, is under a similar duty to correct any incorrect response when Defendant later learns that it is incorrect, including in such supplemental answer the date upon and manner in which such further or different information came to Defendant's attention.

4. Unless otherwise specified, each of these interrogatories are meant to apply to the time period from 1920 until the present.

5. Should Defendant assert a privilege with respect to any information, Defendant is requested to provide the following as to each such document or item of information:

- (a) The type of document or information (e.g., letter, notebook, telephone conversation, etc.),
- (b) The date of the document or transaction involving the information;
- (c) Identification of the author and/or all participants with respect to the information;
- (d) Identification of the signatory or signatories of the document, if any;
- (e) Identification of the document's current custodian;
- (f) The present whereabouts of the document and/or the names of all persons with personal knowledge with respect to the information; and
- (g) A statement of the grounds on which the claim of privilege rests with respect to each such document or piece of information withheld.

6. If your answer states that Defendant is undertaking an investigation of the subject matter of the interrogatory, state when the investigation began, what steps comprise the investigation and what documents are being reviewed as part of the investigation.

7. The following terms are defined as follows for the purpose of these interrogatories:

DEFINITIONS

As used in this set of Interrogatories, the following terms mean:

1. The words "Defendant," "You," "Your," or "Your company," all mean the corporate Defendant separately answering these Interrogatories, and any of its merged, consolidated, or acquired predecessors, divisions, subsidiaries, foreign subsidiaries, foreign subsidiaries of predecessors, and/or affiliates. This includes, but is not limited to, those known to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products or that incorporated asbestos or asbestos-containing products at any work site. This definition includes present and former officers, directors, servants, agents, employees, and all other persons acting or purporting to act on behalf of the corporate Defendant or its predecessors, subsidiaries, and/or affiliates known to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products. "Predecessors" means any business firm, whether or not incorporated, which had all or some of its assets purchased by you or came to be acquired by you whether by merger, consolidation, or otherwise known to have mined, manufactured, sold, marketed, utilized, or distributed asbestos or asbestos-containing products. "Subsidiaries" means any business firm, whether or not incorporated, which is or was in any way owned or controlled, in whole or in part by Defendant or its predecessors and which is known to have mined, manufactured, sold, marketed, utilized or distributed asbestos or asbestos-containing products.

2. "Document" includes, but is not limited to, correspondence, letter, memoranda,

message, note, report, cable, telegram, photograph, film, tape, and all other written communications of every kind and character; note, recording disk, or any other record of oral communication; microfilm; worksheet; schedule; exhibit; demonstrative aid; letter; contract; agreement; deeds, bills of sale, deeds of trust, security agreements, leases and other instruments or documents of title; maps; diagrams; logs; summaries; printouts; graphs, charts; compilations, tables; publications; manuals; minutes; by-laws; articles of incorporation; resolution; shareholder endorsements; partnership documents; minute books, diaries; calendars, bank statements, tax returns; lists; tapes, video tapes; and any other data compilations from which information can be obtained and translated.

3. "Identify" means to give the date, title, origin, author, and addressee to enable plaintiff to retrieve it from a file; and further, identify means to give the name, address, position, title, and whether a person is employed or not employed by Defendant.

4. The words "person" or "persons" include natural persons, firms, partnerships, associations, joint ventures, corporations, and any other form of business organization or arrangement, and officers, directors, shareholders, employees, agents, and contractors of any business organization or arrangement.

5. The words "meeting" or "meetings" may mean any coincidence or presence of any persons, whether or not such coincidence or presence was pre-arranged, was formal or informal, or was in connection with some other activity.

6. The words "describe" or "description", when referring to a place, thing, or occurrence, mean to identify with sufficient particularity the place, thing, or occurrence so as to

enable one to locate, examine and fully comprehend or understand the place, thing, or occurrence described.

7. The words "product containing asbestos fibers," "asbestos-containing products," or "asbestos products" all refer to any products or materials prepared in any way for sale and/or distribution that contained any kind of asbestos in any possible form. The words "asbestos materials" refer to any and all materials, substance, or matter used or assembled or fabricated during the manufacture of a product, and that contain at least some asbestos fibers. "Product" includes, but is not limited to, pipecovering, turbines, cement, block, gaskets, packing, plaster, joint compound, floor and ceiling tiles, mastics, boilers, raw fibers, fireproofing, shingles, panels, sheets, boards, millboard, refractory cement, boilers, firebrick, brake and clutch linings, finishing compound, texture, and other construction, building, drywall, lath and insulation materials.

8. The words "design changes," or "modifications" mean alterations in the makeup and/or components of a particular product, including but not limited to, variations in the amount or type of asbestos used in the process of manufacturing the product.

9. The words "distribute," "distributed," "distributor," or "distribution" all refer to the sale, marketing, dispersal and/or shipment of asbestos-containing products for purposes of their sale, resale and/or for purposes of filling orders provided by other business concerns. The word "distributor" specifically refers to a company or its sales representatives, whether dependent or independent, responsible for sales or marketing of products.

10. The words "marketed," or "market" mean and include all efforts to assist in the distribution and/or sale of products. More generally, these terms refer to only efforts on your part

or the part of manufacturers or distributors to sell or otherwise distribute products.

11. The words "medical advisory capacity" refer to the duties, abilities or capabilities of any member of Defendant's staff, or any individual or organization who has contracted with Defendant, to provide services of a medical nature, including but not limited to providing medical advice.

12. The words "trade organization," or "trade association" mean any organizations or associations of business or industrial entities that are associated and/or meet for the purpose of achieving common goals and/or exchanging information related to common needs or interests, and/or learning information or facts of interest to the various members of the organization or association.

13. The word "plant" means a manufacturing or assembly facility where products are assembled, manufactured, constructed, fabricated, or where component parts, materials, substances, or matter of such products are fabricated, assembled, or manufactured or are prepared for further fabrication and/or assembly.

14. The word "manufacture," or "manufactured" means to fabricate, to construct, to assemble, prepare for fabrication or assembly, or any other action taken prior to completion of the product or material before the time of its shipment.

15. The words "sales materials," or "written sales materials" mean any and all documents or literature of a promotional nature that were created or printed for the purpose of assisting in the marketing or distribution of the products. Such documentation may include, but is not limited to, sales invoices, order slips, and other written indicia of orders received and sales

made.

16. The words "rebranding agreement" mean an agreement of any kind whereby one party to the agreement is provided products by the other party to the agreement and the agreement contemplates that the first party will place the brand name of its choice upon the products, either by repackaging or otherwise, and then proceed to sell, market, distribute and/or place the product in the stream of commerce, utilizing its new brand name.

17. The words "research" or "research department" refer to efforts, whether scientific or otherwise, to develop new and/or different types of products, processes or designs of pre-existing products and is meant to incorporate all efforts that specifically contemplated the possible alteration of products.

18. The words "medical department" refer to an individual or a section or group of individuals working for Defendants, either directly or in a contractual capacity, whose purpose was or is to provide guidance, assistance, or advice concerning any aspects of medical health, including but not limited to, the safety of Defendant's workers and the safety of individuals using products manufactured by Defendant.

19. The words "industrial hygiene surveys" mean surveys, tests, interviews, or other procedures taken or effectuated for the purpose of determining air quality, air contamination, dust content, safety of a facility or hazards at any site or facility.

20. The words "health hazards," or "potential health hazards" refer and relate to any injury, effect, damage, scarring, wound, impairment or disability of any part of the human anatomy, including but not limited to the lungs and lung linings.

21. The words "test" or "testing" are used in their broadest sense, including but not limited to, studies of atmospheric dust samples, studies of the concentration of asbestos in such airborne test samples, studies of the lung conditions of workers (by x-ray or other means of medical surveillance), pulmonary function studies of workers, animal studies, pathological studies, industrial hygiene studies, risk assessment studies, cost-benefit analyses and any other studies on the product concerning health and safety required by any governmental agency.

INTERROGATORIES

1. For each Interrogatory below, please state the name and last known address of each person answering it, including whether he/she is employed by Defendant and if employed by Defendant include job title, length of time employed by Defendant and a year by year list of all other positions, titles, or jobs held when working for Defendant.

ANSWER: Gerald T. Menke, Sr.
3450 Beekman Street
Cincinnati, OH 45223
Employed by defendant 27 years.
Treasurer - July 1974 to April 30, 1992.
Secretary/Treasurer - May 1, 1992 to present.

1.1 Please identify all documents used, related to, or referred to in connection with the preparation of or answers to these Interrogatories and state the number of the Interrogatory and its subpart to each such document.

ANSWER: F. D. Lawrence Electric Co. Catalogue No. 100.

2. Please state whether or not Defendant is a corporation. If so, please state:

- (a) Your correct corporate name;
- (b) The state of your incorporation;
- (c) The address of your principal place of business;
- (d) Your registered agent for service in the state of Ohio;
- (e) For each Defendant claiming that this Court lacks personal jurisdiction, list year by year the total amount of income received by Defendant from entities in Ohio, any and all years that Defendant, as defined, has been licensed to do business in Ohio, and any real property owned at any time by Defendant or its present or past subsidiaries.

ANSWER: Yes (a) The F. D. Lawrence Electric Co.
 (b) Ohio
 (c) 3450 Beekman Street, Cincinnati, OH 45223
 (d) Alan M. Faulhaber
 (e) Not applicable ("N/A")

3. State Defendant's complete corporate or business history, including dates of incorporation, mergers, consolidations, reincorporations, and the like. Also provide historical information regarding all predecessors, prior names, asset purchases, acquisitions or spin-offs. In addition:

- (a) if Defendant or any of its predecessors or subsidiaries at any time purchased, assumed, or in any other manner acquired ANY of the assets and/or liabilities of any corporation or entity at any prior time engaged in any aspect of the placing of asbestos-containing products into the stream of commerce or the insuring of asbestos-related risks, then please state the following as to each acquisition:
- (b) the name or description of each corporation, entity or assets acquired by Defendant, that entity's state of

incorporation and principal place of business, its date of incorporation, and the name of Defendant at the time of acquisition;

- (c) the manner by which each such corporation, entity or interest therein, was acquired (e.g., merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- (d) the date of each such acquisition;
- (e) the state in which each such acquisition was effected;
- (f) the state law governing each such acquisition if specified by contract;
- (g) whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (h) identify each document reflecting or related to the history and/or transaction(s) set forth in answer to this Interrogatory.

ANSWER: Incorporated in Ohio on July 5, 1904. Business is wholesale distribution of electrical parts. No corporate reorganizations, acquisitions or divestitures. Defendant operates as a single organizational unit.

4. Please state whether or not Defendant has purchased, assumed, or in any other manner acquired any of the assets and/or liabilities of any corporation or entity (such corporations or entities being limited to those engaged in the mining, selling, manufacturing, marketing or distribution of asbestos-containing products.) If so, please state the following:

- (a) the name or description of each corporation, entity or assets acquired by Defendant, its state of incorporation and principal place of business, its date of incorporation, and the name of Defendant at

the time of acquisition;

- (b) the manner by which each such corporation, entity, or interest therein, was acquired (e.g. merger, consolidation, change of name, stock sale, transfer or purchase of assets or product line);
- (c) the date of each such acquisition;
- (d) the state in which each such acquisition was effected;
- (e) the state law governing each such acquisition if specified by contract;
- (f) whether Defendant became legally responsible for the past torts of each such corporation or entity;
- (g) whether the acquisition concerned asbestos-containing products.

ANSWER: No.

4.1 For each corporation, other than the answering Defendant, that has at any time in the past been involved in the placing of asbestos-containing products into the stream of commerce for which officers of the answering Defendant's corporation have also served as officers, directors or served in any managerial position while employed by the answering defendant, state:

- (a) the name of the entity involved in the placing of asbestos products into the stream of commerce;
- (b) the manner in which the entity was involved in the placing of asbestos containing products into the stream of commerce (i.e., mining, milling, manufacturing, distributing, installing, rebranding, etc.);

- (c) the specific products placed into the stream of commerce by the entity, year by year and by brand or trade name;
- (d) the name, positions and a brief description of the responsibilities of the person or persons serving the answering Defendant and the entity simultaneously, including the positions held with the entity and with the answering Defendant.

ANSWER: None.

5. Has Defendant ever engaged in the mining, manufacturing, selling, marketing, installation or distribution of asbestos-containing products? If so, please state the following:

- (a) The name of the company engaged in the activity (whether it is Defendant, Defendant's predecessor, Defendant's subsidiary or some other entity related to Defendant);
- (b) As to each product mined, manufactured, sold, marketed, installed or distributed, please state the following:
 - (1) The trade or brand name.
 - (2) Its identification number (model, serial number, etc.).
 - (3) The time period it was manufactured, mined, marketed, distributed or sold.
 - (4) Its physical description including color, general composition, and form.
 - (5) A detailed description of its intended use and purpose.
 - (6) A detailed description of the type package in which it was sold,

listing the dates of each type of package used, a physical description of the package, and a description of any printed material or trademarks that appeared thereon.

- (7) The percent of asbestos which it contained.
- (8) The percent of asbestos by asbestos type (amosite, crocidolite, tremolite, anthophyllite, chrysotile).
- (c) The time period during which each of these products were on the market;
- (d) The material components/ingredients of each such product, giving specific or approximate percentage both by weight and by volume of each material component/ingredient (this interrogatory is not limited to the asbestos component of the product but seeks information as to the nature, weight and volume of non-asbestos ingredients, as well) of each such product;
- (e) How each of these asbestos-containing product can be distinguished from those of competitors;
- (f) A description of the physical appearance of such product;
- (g) A detailed description of the intended uses.

ANSWER: Defendant listed certain asbestos-containing products for sale in its Catalogue No. 100 issued in 1949. Defendant has no records of the purchase or sale of these products. Defendant no longer lists such products for sale and retains no records as to those products. Defendant has no information pertaining to these products other than the 1949 catalogue listings which are attached to these answers in Exhibit 1. Defendant incorporates those listings to the extent they are responsive to the sub-parts of this interrogatory.

6. Does Defendant or any of its subsidiary companies claim that any patent would cover any product listed in answer to Interrogatory No. 5? If so, please state the following:

- (a) The date of each patent;
- (b) The date same was issued;
- (c) The number of each patent application that is pending.

ANSWER: No.

7. Have any of the products listed above in answer to Interrogatory No. 5 been altered in chemical composition since first being marketed? If so, please state the following:

- (a) The trade name of each such product;
- (b) The date each such product was altered;
- (c) The nature of the alteration;
- (d) The reason for the alteration.

ANSWER: Unknown.

8. Have any of the asbestos-containing products listed in response to Interrogatory No. 5 ever been marketed, distributed, packaged, labeled, and/or sold by any other company or business? If so, please state the following:

- (a) The name and address of each such company.
- (b) The names and address of Defendant's distributors in Ohio, West Virginia, Pennsylvania and Kentucky since 1940.
- (c) The date of each sale.
- (d) The name of the person at each location with whom you primarily dealt.
- (e) A list of all asbestos-containing products that you sold to each location from 1945 to 1980.

- (f) The amount of each asbestos product sold to each location during this period.
- (g) Please identify all documents relating to this distributor for the particular location.

ANSWER: Unknown.

8.01 Has Defendant ever purchased asbestos-containing products from any other Defendant?

ANSWER: Unknown.

8.02 If the answer to the preceding Interrogatory is yes, please state the following:

- (a) name each Defendant from whom this Defendant purchased any asbestos-containing product;
- (b) list each product purchased from each co-Defendant;
- (c) list the dates of each purchase of asbestos-containing products from each co-Defendant.

ANSWER: N/A

8.03 Has Defendant ever sold asbestos-containing products to any other Defendant?

ANSWER: Unknown. Defendant has no records of such sales.

8.04 If the answer to the preceding Interrogatory is yes, please state the following:

- (a) name each Defendant to whom this Defendant sold any asbestos-containing product;
- (b) list each product sold to each co-Defendant;
- (c) list the dates of each sale of asbestos-containing products to each co-Defendant.

8.05 Has Defendant engaged in the manufacture and/or sale and/or distribution and/or marketing and/or supply and/or purchase and/or use of non-asbestos-containing products for use in connection with temperatures above 125° Fahrenheit since 1930? If so, please state:

- (a) the date such activity began;
- (b) the years during which such activity took place;
- (c) the date when such activity was terminated;
- (d) if such activity was terminated, the reason(s) why;
- (e) the geographical area into which you claim the product(s) were sold, purchased, or used;
- (f) identify the organizational unit of Defendant so engaged;
- (g) the site(s) at which each such product was manufactured;
- (h) the material components of each such product, giving specific or approximate percentage both by weight and by volume of each material component of each such product;
- (i) the temperature ranges for which each product(s) was intended to be used;
- (j) the product's generic name;

- (k) the product's trade or brand name;
- (l) the container in which the product was shipped (i.e., paper bags, cardboard boxes) including the size and amount of the container;
- (m) a description of any logos, writing impressions or identifying markings which appeared on the product, as well as a description of the package used, the dates that type of package was used, and any logos, product names, trademarks, etc. which appeared on the package;
- (n) whether the words "non-asbestos" or "asbestos free" were used on the package;
- (o) a detailed description of the intended method of preparation and application of the product;
- (p) a description of the physical appearance of the product, including size, shape, color and texture.

ANSWER: To the extent that the descriptions in the attached catalogue listings from 1949 indicate such use, defendant incorporates such listings herein in response to this interrogatory. Defendant has no other records containing information responsive to the questions.

8.06 Did Defendant ever market or distribute any asbestos-containing product

manufactured in whole or in part by someone else? If so, please state the following for each such product:

- (a) the name and address of the manufacturer;
- (b) the product's trade and brand name;
- (c) the organizational unit of Defendant who did so;
- (d) date(s) beginning, ending and during which the marketing or distributing took place;
- (e) whether the product was distributed through the same channels as those used for products

manufactured by Defendant, and if not, please explain the exact channels of distribution;

- (f) identify all documents relating the marketing or distribution.

ANSWER: Defendant marketed the products in Exhibit 1 by listing them in its 1949 catalogue. The only information presently available concerning the products is that shown in Exhibit 1. Defendant has no information about the period or methods of marketing and/or distribution, nor any other documents concerning marketing or distribution.

8.1 Does Defendant have reason to believe that any of the asbestos-containing products listed in response to Interrogatory No. 5 were used at any of the sites listed on Exhibit A, attached hereto? If your answer is "yes", please state:

- (a) The basis of your answer.
- (b) Which of Defendant's asbestos-containing products listed in Interrogatory No. 5 were used at each job site listed on Exhibit A.

ANSWER: No.

8.2 For each company or business that Defendant knows may have marketed, distributed, installed, and/or sold those products listed in response to Interrogatory No. 5, please state the following as to each job site listed on Exhibit A:

- (a) The name and address of each such company;
- (b) The date of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt.
- (d) Names and quantities of the asbestos-containing products that you marketed, distributed, installed, and/or sold to each such company from

1950 to 1974.

- (e) Identify all documents relating to the sales to each such company.

ANSWER: None known.

8.3 If you do not know any business that may have marketed, distributed, installed, and/or sold the products listed in response to Interrogatory No. 5 to any of the job sites listed on Exhibit A, please state the names and last known addresses of those companies who Defendant knows marketed, distributed, installed and/or sold their asbestos-containing products in Ohio from 1950 to 1974. For each of those companies, please state the following:

- (a) Name and address of each such company;
- (b) The dates of each sale from Defendant to such other company;
- (c) The name of the person at each other company with whom Defendant primarily dealt;
- (d) The names of the asbestos-containing products that Defendant marketed, distributed, and/or sold to each such company from 1950 to 1974.

ANSWER: None known.

8.4 Does Defendant have records and/or any knowledge that reflects sales of their asbestos-containing products to any of the sites listed on Exhibit A, attached hereto? If so, please

state the following as to each job site listed on Exhibit A:

- (a) The names and last known addresses of those people with such knowledge.
- (b) The location of such records.

ANSWER: No.

9. Did Defendant or any of Defendant's distributors, as listed in response to Interrogatory Nos. 8.1, 8.2, and/or 8.3 have sales representatives who specifically called on the sites listed on Exhibit A, attached hereto, from 1945 to 1975? If your response is yes, as to each site listed on Exhibit A, please state the following:

- (a) The name and last known address of each such representative and whether they are still employed by Defendant;
- (b) The period of time they acted as your representative;
- (c) Their general responsibility as to each facility;
- (d) Whether that person is still alive; and
- (e) Any documents relating, referring or pertaining thereto.

ANSWER: Unknown.

9.1 Identify all managers and sales personnel responsible for your sales or installation

of any asbestos-containing products in Ohio from 1930 to the present and state their position, last known address and the local or regional office through which they were employed.

ANSWER: None known. Defendant has not sold or marketed asbestos-containing products for over 20 years and does not maintain records of sales or staff for the time period in question.

10. Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing products? If so, please state:

- (a) The name of each subdivision;
- (b) The full address of the home office and the date such subdivision or subsidiary was engaged in this contracting business; and
- (c) Whether said division or subsidiary conducted such business at any of the sites listed on Exhibit A from 1940 to 1975? If so, please state the following as to each job site listed on Exhibit A:
 - (1) The dates of such contracts;
 - (2) The specific asbestos-containing products that were used or removed in each contract.

ANSWER: No.

11. Did Defendant ever have any division or subsidiary engaged in the contract business of applying or removing asbestos-containing refractory? If so, please give the name of each subdivision, the full address of the home office and the date such subdivision or subsidiary

was engaged in this contracting business.

ANSWER: No.

12. Please identify by location and product produced, each plant in which products listed in your answer to Interrogatory No. 5 have been manufactured and/or assembled and the dates said plants have been in operation.

ANSWER: Unknown.

13. Has Defendant, at any time, entered into a "rebranding" agreement with any other company, either as a buyer or a seller, concerning any asbestos-containing products and/or materials? If so, please state:

- (a) The name of the company manufacturing the asbestos products under such agreement;
- (b) The trade name affixed to such products;
- (c) The periods of time covered by each such agreement;
- (d) The volume (in dollars amounts) of each such transaction;
- (e) The purchaser of such products;
- (f) Does Defendant currently have in its possession any of the writings or contracts concerning such rebranding agreement?

ANSWER: No.

13.1 Have you ever owned or operated a business or portion thereof which engaged in construction, erection or tear-out of furnaces, pipes, boilers, turbines, lehrs, ovens, kilns, etc? If so, please state:

- (a) the name of said business;
- (b) the date of commencing business and cessation of business, if applicable;
- (c) type of construction or tear-out performed;
- (d) state whether said business installed or supplied asbestos-containing products on the furnaces, pipes, boilers, turbines, lehrs, etc., i.e., gaskets, pipecovering, block, cement, rope, cloth, clothes, etc., containing asbestos, asbestos pipe, board, etc.;
- (e) state the trade name and/or manufacturer of any asbestos-containing product which you installed or supplied to any site on Exhibit A.
- (f) provide the dates for the applicable construction, installation or tear-out project.

ANSWER: No.

13.2 Do you have within your custody, possession, or control any packages that presently or formerly packaged asbestos-containing products or were produced for the purpose of packaging asbestos-containing products contemporaneous with your manufacture sale or distribution of such asbestos-containing products? If so, provide the following:

- (a) a description of each such package;
- (b) the present location and custodian of each such package;
- (c) the date or approximate date on which each such package was produced.

ANSWER: No.

14. What is the name, address and job title of each individual who participated in the design and preparation of manufacturing specifications for each such product listed above in answer to Interrogatory No. 5?

ANSWER: None.

15. As to each product listed in response to Interrogatory No. 5, please describe how each product was to be cut, shaped, scribed, mixed and applied on the job. In answering this question, give particular reference as to whether or not the materials were to be sawed or cut on the job, blown into confined areas, mixed with water in a cement or paste.

ANSWER: Unknown.

16. Based upon the material contents of the asbestos-containing products, the method of manufacturing, and the method of application, please state which products listed in Interrogatory No. 5 could be applied by a worker without creating dust.

ANSWER: Unknown.

17. Do any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character now exist relating to the design and preparation of the products listed in answer to Interrogatory No. 5? If so, please:

- (a) List each such written material or document;
- (b) Identify the person or persons presently in possession of each such document;
- (c) State where each such document is located.

ANSWER: No.

18. Prior to releasing the products listed in Interrogatory No. 5 for sale and usage, were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

- (a) The name of the products tested and the date of each test.

- (b) The name, address, and job classification of each individual who conducted such tests;
- (c) The results of such tests.

ANSWER: No.

18.1 Prior to releasing any products for sale and usage (whether asbestos-containing or not), were any tests (either animal or human) conducted on said products to determine potential health hazards involved in the use of, or exposure to, the materials and/or products? If so, please state:

- (a) The name of the products tested and the date of each test.
- (b) The name, address, and job classification of each individual who conducted such tests;
- (c) The results of such tests.

ANSWER: No.

19. Does Defendant have or control any documents, including but not limited to, written memoranda, specifications, recommendations, blueprints or other written materials of any kind or character relating to the testing of the products listed in Interrogatory No. 5 hereinabove?

- (a) Identify each such written material or document;
- (b) Identify each person who presently has possession of each such document;

- (c) State where each such document is located.

ANSWER: No.

20. Were any design changes or modifications made as a result of such tests listed in answer to Interrogatory No. 18 hereinabove? If so, please state:

- (a) The trade name of the product changed or modified;
- (b) The nature of the change made and the date of such changes or modifications;
- (c) The name, address, and job classification of each person in charge of making a change.

ANSWER: N/A

21. After releasing for sale, distribution or marketing the products listed in answer to Interrogatory No. 5, did Defendant conduct any tests (either on animals or humans) to determine potential health hazards involved in the use of said materials and/or products?

- (a) The names of the products tested and the dates of said tests;
- (b) The name, address, and job classification of each person and/or agency conducting said tests;
- (c) The results of said tests;

- (d) Whether, as a result of any tests conducted, any products were removed from the market;
- (e) The names of all products removed from the market as a result of said tests.

ANSWER: No.

22. Has Defendant ever conducted or caused to be conducted any studies concerning the effects of the inhalation of asbestos dust and/or fibers on workers or other persons applying, using and/or working around any of the asbestos products manufactured, sold, distributed and/or relabelled for distribution by you or your predecessor? If so, please state:

- (a) The dates and nature of such studies;
- (b) The names and addresses of persons conducting such studies;
- (c) The purpose of such studies;
- (d) Identify and list those persons to whom such reports were given and the date of such dissemination;
- (e) State any publication or other written dissemination of the results of such studies;
- (f) State the nature of any action to eliminate or minimize the inhalation of asbestos dust fibers; and
- (g) Attach a copy of reports based upon such studies.

ANSWER: No.

23. Before placing in the market the asbestos-containing products that Defendant, mined, manufactured, sold, marketed, installed or distributed on the market, did Defendant make or cause to be made, any studies to determine whether their asbestos-containing products would be hazardous to people? If so, please state:

- (a) The date of said studies;
- (b) What studies were done; and
- (c) The titles of each study.

ANSWER: No.

24. Please state whether or not Defendant ever conducted or caused to be conducted any tests in the field (where asbestos-containing products were applied, removed or utilized) to determine the nature and extent of asbestos dust and/or fiber exposure to insulators, applicators, fellow employees, or other workers removing and/or tearing out asbestos-containing products, and/or other workers in the vicinity thereof? If so, please identify:

- (a) The date, place and nature of each and every test;
- (b) The particular asbestos-containing products to which each test applied;
- (c) The results of each test with particular reference to the number of asbestos fibers per cubic centimeter of air found at each site; and
- (d) The persons to whom the results said tests were given and the date of such

dissemination.

ANSWER: No.

25. Please state whether or not Defendant ever obtained any knowledge concerning the likelihood of asbestos being hazardous to human health. If so, please state:

- (a) When Defendant first became aware of the hazardous potential of asbestos dust and asbestos fibers;
- (b) The manner in which the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first obtained this knowledge and became aware of said hazards and from what source this information was obtained;
- (c) What information was disseminated within Defendant's company, or its subsidiary or predecessor regarding such adverse consequences or effects;
- (d) Whether any such information is still maintained by Defendant or its subsidiary or predecessor in any written form.
- (e) The name, address and job classification of the custodian of such information.

ANSWER: No knowledge obtained other than that reported in the news media from time to time. No record of when such media reports were made.

26. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of asbestosis and cancers including, but not limited to gastrointestinal cancer, laryngeal cancer, renal cancer, lymphoma,

lung cancer and mesothelioma. As to each disease or condition, please state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER: See answer to preceding interrogatory.

27. Please identify all physicians, industrial hygienists, and other employees (including their names and addresses) who were employed, retained or otherwise engaged by Defendant for research, investigation or study concerning asbestos or asbestos-related diseases.

ANSWER: None.

28. As to each person who acted in a medical advisory capacity (as it relates in any way to asbestos) to Defendant, please list their name, the date individual acted in this capacity, and that person's current address and job title.

ANSWER: N/A

29. Please state if any medical officer or industrial hygienist or medical consultant ever made at any time any recommendations and/or suggestions to Defendant pertaining to the risks or

hazards to persons involved in the manufacture or use of asbestos products and, if so, please state when, by whom or to whom such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER: No.

30. Please state the scientific and/or medical periodicals to which Defendant, its medical department, research department, industrial hygiene divisions, engineering department or consulting physicians subscribed between 1945 and 1975.

ANSWER: None.

30.1 Please state whether Defendant, its medical officer or industrial hygienist or medical consultant or physicians were ever involved in testing or received literature or correspondence from the Mellon Institute.

ANSWER: No.

30.2 Has Defendant, or any engineer, industrial hygienist or physician in Defendant's employ, been a member in any professional group, trade group or any of the following groups:

American Ceramics Society
Asbestos Textile Institute
National Insulation Manufacturers Association
Thermal Insulation Manufacturers Association
Quebec Asbestos Mining Association
Asbestos Information Association
Industrial Health Foundation
Industrial Hygiene Foundation
Iron and Steel Institute
National Safety Counsel
Refractories Institute
Air Hygiene Foundation of America, Inc.
Sprayed Mineral Fiber Association
American Society of Mechanical Engineers

If the answer is yes, state the following:

- (a) The name of the group or groups in which Defendant or individual(s) were members;
- (b) The name and position individual(s) within the Defendant, as defined, who were members;
- (c) The years Defendant or individual(s) were members of the groups;
- (d) Whether Defendant paid the individual(s) dues or membership fees or reimbursed the individual(s) for dues or membership fees in the group.

ANSWER: No.

31. State in detail what test, if any, Defendant ever made with regard to the quantity, quality, or threshold limit values of asbestos dust, fibers or particles to which workers were

exposed while using, working with and/or around, installing and/or applying your asbestos-containing products.

ANSWER: None.

32. For each test described in Interrogatory No. 31, please give the name of the person conducting the test, the date of the test, and attach true copies of any documents, including but not limited to, reports, findings or memoranda concerning such tests or studies.

ANSWER: N/A

33. Please state the year that 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.

ANSWER: No such advice has been received.

33.1 State whether Defendant at any time conducted, caused to be conducted, or had conducted on any job site, or at any of Defendant's plants or buildings, any air sampling, dust

counts, dust observations, dust sampling tests or other activities to determine air quality. If your answer is in the affirmative, please indicate:

- (a) the date of any such air samples, tests, or activities;
- (b) by whom such activities were performed;
- (c) where such activities were performed;
- (d) the results of any such activities.

ANSWER: No.

34. Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

- (a) The date each such library was established;
- (b) The location of each library;
- (c) The name(s) of the librarian(s) since 1930;
- (d) List all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety, and/or engineering;
- (e) List all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER: No.

35. Did Defendant in the 1920's or 1930's commission, or participate in the

arrangements with Metropolitan Life Insurance Company for studies at the Trudeau Foundation at Saranac Lake, New York, concerning the effect of inhalation or ingestion of asbestos fibers upon human and/or animal bodies.

ANSWER: No.

36. When was Defendant first aware of reports of studies of the Trudeau Foundation at Saranac Lake, New York, entitled "Effects of the Inhalation of Asbestos Dust in the Lungs of Asbestos Workers" by A.J. Lanza, Assistant Medical Director published in the J. Public Health Report, Vol. 50, No. 1, dated January 4, 1935 ("Lanza Report")?

ANSWER: Never.

36.1 Did Defendant ever contract with Saranac Laboratories to study the hazards of any dust producing product manufactured by you (whether asbestos-containing or not)? If so, identify by date and author all documents concerning or any way related to such study.

ANSWER: No.

36.2 Did Defendant ever contract with Saranac Laboratories to analyze dust or products? If so, identify by date and author all documents concerning or any way related to such analysis.

ANSWER: No.

37. Please state whether Defendant at any time has been a member of any "trade organization" or "trade association" composed of other manufacturers, miners, distributors, and/or sellers of asbestos-containing products and, if so, please identify the name and address of each such association or organization, the dates of membership, and the names of any publications issued or written by such association or organization.

ANSWER: Defendant is a member of the National Association of Electrical Distributors but does not believe that this is an association of other "distributors and/or sellers of asbestos-containing products." Defendant has no record of when it first became a member of this association. This association has published two periodicals: "Electrical Distributor" and "Electrical Wholesaler."

38. With respect to each trade organization or association listed in answer to Interrogatory No. 37, please state whether the minutes of the group's meetings and any correspondence between the members of such groups concerning the hazards of asbestos exposure are available.

ANSWER: Unknown.

39. Please identify by name the technical and trade association periodicals to which Defendant subscribed, and state whether Defendant had knowledge of any articles being printed, or withheld from printing, in said periodicals pertaining to the potential hazards of asbestos. If so,

please state the following:

- (a) The title of each such article;
- (b) The periodical in which each such article was published;
- (c) The date each such article was published;
- (d) A detailed explanation of the reason for withholding any such article for printing;
- (e) Produce documentation which refers, alludes or mentions articles which were withheld for publication.

ANSWER: The publications are "Electrical Distributor" and "Electrical Wholesaler." Defendant has no knowledge as to whether such publications printed or failed to print asbestos-related articles.

40. Please state whether, prior to 1975, Defendant sponsored, or attended any meeting, seminar, conference, convention or legislative hearing where the subject of occupational health and exposure to asbestos was discussed and, if so, please state the date and place of such meeting and the name and address of any speakers or participants.

ANSWER: No.

41. As to each product listed in response to Interrogatory No. 5, please state whether Defendant, at any time, published and/or distributed any printed materials, including but not limited to brochures, pamphlets, catalogs, packagings or other written materials of any kind or

character that contain any warnings, cautions, caveats or directions concerning the possible health effects of the products on a person. If so, please state as to each product:

- (a) The name of each relevant product;
- (b) The wording of each such warning;
- (c) A description of each such printed material;
- (d) The method used to distribute the warning to persons who are likely to use the products;
- (e) The date each such warning was issued;
- (f) Whether any warning accompanied any of your asbestos-containing products' sales literature, handout or pamphlets;
- (g) Please attach a copy of the warning and date said warning was issued;
- (h) The name, address, and job classification of each person who presently has possession of the above-described documents;
- (i) The name or names and addresses of the company who provided, produced, or manufactured the boxes or containers on which the warning appeared and dates these boxes with the warnings appeared.

ANSWER: Please refer to the attached copy of excerpts from Defendant's 1949 catalogue for any statements about the products in question. The attached copies are defendant's only records on this subject.

42. Has sales material been prepared by Defendant or its agents for purposes of marketing or advertising the asbestos products listed in answer to Interrogatory No. 5? If so, please state:

- (a) The name and address of each person or entity who prepared same;

- (b) The name, address and job title of each person who presently has possession of same;
- (c) The date same was prepared;
- (d) The media used to disseminate the sales material.

ANSWER: Yes, Catalogue No. 100 was the only sales material prepared that defendant is presently aware of.

- (a) It was prepared by the Jaqua Company of Grand Rapids, Michigan.
- (b) Gerald T. Menke, Sr., Secretary/Treasurer of defendant, has possession of a copy.
- (c) 1949
- (d) The catalogue was printed and bound.

43. Has any written material of any kind or character been prepared by Defendant, Defendant's predecessor or any of Defendant's subsidiary companies or their agents indicating how the products listed in answer to Interrogatory No. 5 should be used or maintained by the ultimate user or those working in facilities or at job sites where the product was used, installed or removed, including, but not limited to, those sites listed on the job site list attached as Exhibit A? If so, please state the following:

- (a) The name, address and job classification of each person who prepared same;
- (b) The name, address and job classification of each person who presently has possession of same;
- (c) The dates and manner in which said material was distributed to purchasers of the products in answer to Interrogatory No. 5.

ANSWER: The attached copy of the catalogue contains the only information available to defendant on this subject. Defendant has no record of the persons who prepared it or when and how it was distributed, if at all.

44. Was any written material of any kind prepared by Defendant and distributed to those individuals listed in response to Interrogatory No. 9? If so, please state the following:

- (a) Identify the written material by content and date;
- (b) To whom was it delivered.

ANSWER: No.

45. Does Defendant contend that asbestos-containing products can be manufactured so as to eliminate all potential health hazards to persons working with or around, installing or applying same? If so, please state the following:

- (a) The date that Defendant first determined that another product could be used in place of asbestos;
- (b) The chemical of the substitute;
- (c) Whether the substitute is suitable for the purpose for which they are to be used;
- (d) Whether Defendant used the substitute for asbestos to 1971;
- (e) Whether Defendant ever used the substitute for asbestos for high or low heat insulation.

ANSWER: Defendant does not make such a contention at present, but reserves the right to do so if warranted by further discovery or expert witness consultation in this case.

46. Did Defendant give any warnings to any individuals at the sites listed on Exhibit A, including any individuals who owned, operated, or managed the facilities at the sites listed on Exhibit A, regarding the potential health hazards of any product listed in response to Interrogatory No. 5. If yes, please state:

- (a) Name of person most knowledgeable about this communication.
- (b) Name of person at the sites listed on Exhibit A, attached hereto most knowledgeable about this communication.
- (c) Dates of each communication.
- (d) Contents of each communication.

ANSWER: No.

47. Did any person prior to 1970, file a claim against any Workers' Compensation carrier covering Defendant alleging that he or she contracted a disease as a result of exposure to asbestos? If so, please state the following:

- (a) A list of each such claim by claimant's name, date filed, the caption and jurisdiction involved;
- (b) The disease alleged in each such claim;
- (c) A brief summary of the disposition of each such claim; and
- (d) The name, address and job classification of the person or persons having custody of the records pertaining to each such claim.

ANSWER: Unknown.

47.1 Please identify all documents concerning or in any way related to any decisions made by you to cease manufacturing asbestos-containing products.

ANSWER: N/A

47.2 Has any person or company from which you purchased asbestos-containing products ever issued a recall of their products or taken any action to take those products off the market after said products were in your possession? If so, provide:

- (a) the date of said recall;
- (b) the name of the company which issued the recall;
- (c) a copy of the recall.

ANSWER: Unknown.

47.3 State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the manufacture or production of asbestos-containing products.

ANSWER: None.

47.4 State what action, if any, you have ever taken since 1930 to minimize or eliminate any risk of occupational disease or pneumoconiosis to those at any time engaged in the use, as distinguished from the manufacture, or exposed to the use of asbestos-containing or industrial insulation products or who were otherwise exposed to asbestos-containing or industrial insulation products.

- (a) describe such action;
- (b) state when such action was taken;
- (c) state what written material exists related to such action;
- (d) state the names, job titles and last known address of the individuals who undertook such actions.

ANSWER: None.

48. Did Defendant receive notice prior to 1968 that any person was claiming injury or had sustained an abnormal x-ray reading as a result of using asbestos products manufactured, sold, installed, and/or distributed by Defendant? If so, please state:

- (a) The name and address of each claimant;
- (b) The date of notice of each claim;
- (c) A description of the claim;
- (d) The type of injuries allegedly sustained;
- (e) The name and address of each attorney representing the individuals making

such claims;

(f) The style and court number of each such claim;

(g) The resolution of each claim.

ANSWER: Not to our present knowledge.

48.1 Describe the method by which you have maintained records concerning the manufacture, sale, supply, distribution, use, advertising, delivery and/or installation or tear-out of each of asbestos-containing products. For each description provide the following:

- (a) each present and former company or corporate department, division or subdivision responsible for maintaining such records;
- (b) the manner in which the records are kept (e.g., boxes, computer tape, microfilm, etc.);
- (c) the inclusive dates of any such manufacture, sale, supply, distribution, use, advertising, delivery, and/or installation or tear-out which such record keeping system covers;
- (d) the present location at which all such records are maintained;
- (e) the identity of each person employed by you at any time from 1930 to the present who is or was responsible for the collection and maintenance of such records.

ANSWER: No such records have been maintained.

48.2 State whether any records concerning the manufacture, sale, supply, distribution, advertising, delivery, use or installation or tear-out of asbestos-containing products have been

destroyed or discarded and if so, indicate:

- (a) the date and location of such destruction or discard;
- (b) the custodian and location of such records prior to their destruction or discard and the identity of each employee, representative, official or agent who ordered, authorized or supervised such destruction or discard.

ANSWER: Unknown.

48.3 For all documents, other than invoices, work orders and/or purchase orders, which relate to matters relevant to all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?
- (d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?
- (e) What manner of electronic format is used?

ANSWER: Catalogue No. 100 is the only document available. Excerpts are attached, including the index to the catalogue. The original is available for inspection by prior arrangement through counsel.

48.4 For all invoices, work orders and/or purchase orders, which relate to matters relevant to all the preceding interrogatories:

- (a) Is there any kind of index for the documents?
- (b) How many pages is the index of documents?
- (c) How many documents are referred to in the index?

(d) Is the index maintained in electronic format (i.e. database, word processing or other computerized format)?

(e) What manner of electronic format is used?

ANSWER: No such documents exist.

49. Has Defendant obtained statements from any witnesses including Plaintiffs? If so, please:

(a) list each witness who has given a statement and the name, address, and job title of each person having custody of any such statement.

ANSWER: No.

50. Do you contend that Plaintiff/Decedent improperly used those products listed in response to Interrogatory No. 5? If so, please set forth in detail in what respect the product was improperly used.

ANSWER: Defendant does not presently so contend, but reserves the right to do so if warranted after further discovery.

51. As to the sites listed on Exhibit A, and as to each Plaintiff/Decedent, please state whether Defendant contends that there was any substance other than asbestos which contributed to or caused Plaintiff/Decedent's injuries. If your answer is yes, please state the following:

- (a) The facts upon which you rely;
- (b) The identity of the sources upon which you rely which substantiate these facts.

ANSWER: Defendant is unable to respond to this interrogatory until further discovery has taken place.

52. Would any respirator, mask or other breathing devices prevent inhalation of the asbestos dust and fibers contained in products listed in answer to Interrogatory No. 5? If so, state:

- (a) When the respirator was sold;
- (b) A detailed description of such respirator or other breathing devices, including name of manufacturer and model number;
- (c) The basis of your claim that such respirators or other breathing devices will prevent the inhalation of such dust and fibers;
- (d) Identify any tests performed regarding the efficaciousness of such respirators and other breathing devices in preventing the inhalation of asbestos dust and fibers including date, title, author and number;
- (e) List all documents which mention, allude or refer to tests performed on breathing devices which prevented the inhalation of asbestos dust and/or fibers.

ANSWER: Unknown at this time.

53. Does Defendant expect to call expert witnesses at the trial of this case? If so, please state the following:

- (a) Their identity and last known address;
- (b) The subject matter on which the expert is expected to testify;
- (c) The expert's specific conclusion and specific opinions and the specific basis therefore;
- (d) The expert's qualifications to render the opinions set forth above;
- (e) Whether any person identified in sub-paragraph (a) above has provided a report or other documentation to you, and if so, identify such document or report;
- (f) Identify all documents that you have provided to each person identified in response to sub-paragraph (a) above; and
- (g) Describe in detail the education and work history of, and identify any books, treaties, article, published and unpublished reports, studies or other scholarly works authored by any individual identified in response to sub-paragraph (a) above. Alternatively, in lieu of said response, attach a copy of a resume or curriculum vitae and a list of publications to your answer.

ANSWER: Defendant has not yet made any decision about expert witness testimony.

54. Please state the name and last known address of each expert witness who is not retained or employed for that purpose who is an employee of Defendant and will render an opinion within his expertise at the time of trial.

ANSWER: Defendant does not expect to call any employee as an expert witness.

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

ANSWER: Yes.

55.1 For each and every affirmative defense asserted in Defendant's Answer to Plaintiffs' Complaint, or the cross-claims or counter-claims of any party against Defendant, state:

- (a) the facts upon which Defendant relies for each and every affirmative defense;
- (b) each and every document which will be offered to prove each and every affirmative defense; and
- (c) each and every witness who will testify in support of each and every affirmative defense.
- (d) the substance and subject matter of the anticipated testimony of each witness identified in the preceding response.

ANSWER: Objection: Under the local rules of this court, defendant need not assert any such affirmative defense at this time.

56. Does Defendant have policies of insurance that might cover the claims that have been made by Plaintiffs herein?

- (a) If so, please list the name of each insurance carrier who may have coverage, the amount of such coverage, and the dates of each such policy.

ANSWER: Yes. See Exhibit 2.

56.1 Has Defendant ever been involved in any litigation concerning potential insurance coverage for asbestos products liability matters? If so, please state:

- (a) the case caption, court and date of filing of each case in which you have been involved;
- (b) whether you were Plaintiff or Defendant;
- (c) a brief statement of the issues;
- (d) identify by date, author and recipient(s), (including recipients of carbon copies) all documents listed as exhibits by either party in this litigation;
- (e) identify by deponent and date all individuals who were deposed in these cases;
- (f) identify by date, author and recipient(s) all documents that have been placed on a protective order in such litigation;
- (g) identify all expert witnesses retained for use at trial in any of the above litigation by name, address and telephone number.

ANSWER: No.

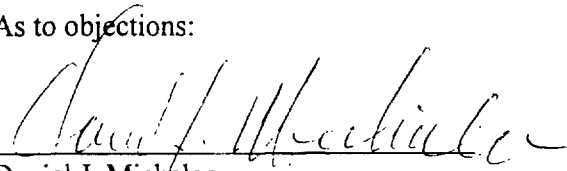
57. Please state the name and address of each person who has knowledge of relevant facts regarding claims and defenses of this lawsuit.

ANSWER: Objection: This interrogatory is too broad and vague to answer.

58. State the last date that Defendant sold, distributed, manufactured, installed, and/or otherwise placed asbestos-containing products into the stream of commerce.

ANSWER: Defendant has no record of ever placing asbestos-containing products into the stream of commerce.

As to objections:


Daniel J. Michalec
Attorney for F.D. Lawrence Electric Co.

Verification

STATE OF OHIO)
) SS.
COUNTY OF HAMILTON)

Gerald T. Menke, Sr., states that the foregoing answers to interrogatories are true and accurate to the best of his knowledge and the knowledge available to him as Secretary/Treasurer of the F. D. Lawrence Electric Company, an Ohio corporation.

Gerald T. Menke, Sr.

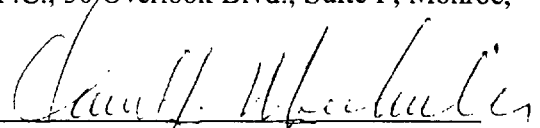
Sworn to and subscribed personally before me this __ day of ~~October~~, 2001.

Notary Public

Certificate of Service

I hereby certify that a copy of the foregoing answers has been transmitted by U.S. Mail to Ladd R. Gibke, Esq., Baron & Budd, P.C., 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas 75219; and to Susan L. Bozorth, Esq., Baron & Budd, P.C., 30 Overlook Blvd., Suite F, Monroe, Ohio 45050 this 21st day of ~~October~~, 2001.

NOVEMBER



Daniel J. Michalec

EXHIBIT A
BARON & BUDD SITE LIST

Queen City Steel, Cincinnati, Ohio
Ford Motor Company, Sharonville, Ohio

58. State the last date that Defendant sold, distributed, manufactured, installed, and/or otherwise placed asbestos-containing products into the stream of commerce.

ANSWER: Defendant has no record of ever placing asbestos-containing products into the stream of commerce.

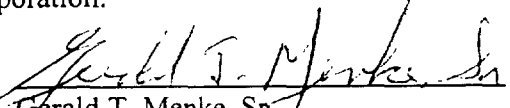
As to objections:


Daniel J. Michalec
Attorney for F.D. Lawrence Electric Co.

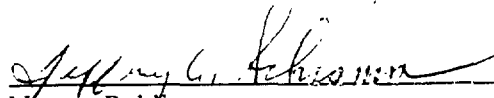
Verification

STATE OF OHIO)
) SS.
COUNTY OF HAMILTON)

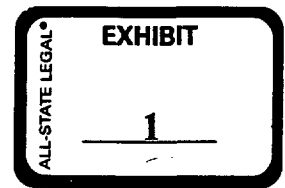
Gerald T. Menke, Sr., states that the foregoing answers to interrogatories are true and accurate to the best of his knowledge and the knowledge available to him as Secretary/Treasurer of the F. D. Lawrence Electric Company, an Ohio corporation.


Gerald T. Menke, Sr.

Sworn to and subscribed personally before me this 26th day of November, 2001.


Notary Public

JEFFREY A. SCHRAMM
Notary Public, State of Ohio
My Commission Expires June 25, 2006



THE
F. D. LAWRENCE
ELECTRIC CO.

Catalog No. 100

Telephone CHerry 6800

General Offices and Warerooms:

217-219 West Fourth Street 216-218 McFarland Street

CINCINNATI 2, OHIO

INTRODUCTION

In compiling our Catalog Number 100, we have attempted to publish a book that will be of real service to the entire electrical trade and are confident you will find it to be so. As is customary, the list prices shown are up to date at the time of going to press, but are in no way to be considered as quotation, as constantly changing of markets precludes the printing of dependable figures. We are always pleased to quote up-to-the-minute prices and terms.

As it is impossible to list in complete detail all items of every manufacturer for whom we act as distributor, we will gladly furnish special catalogs, bulletins, etc., upon request, of the items and lines not described or shown in this catalog.

We respectfully solicit your business, with the promise that we will keep abreast with the ever changing conditions, giving you the quality, service and price that is consistent with good business.

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Electrical Catalog Department
The Jaqua Company
Grand Rapids 2, Michigan



OKONITE CABLE COVERINGS

These illustrations indicate some of the more familiar protective coverings available for Okonite wires and cables. Other types and designs are also available.



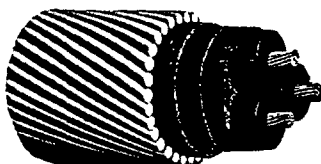
Okoprene ozone and moisture resistant coverings are used where corrosion and vibration destroy lead.



Saturated braid—made from cotton, linen, jute, asbestos, glass and other fibrous materials.



Lead sheath—lead is the best moisture protection—supplied pure or with hardening alloys.



Wire armor—for heavy-duty protection as on submarine cables, available with steel or non-ferrous metals.



Parkway finish—galvanized flat steel or non-ferrous tapes prevent mechanical damage to buried cables.



Interlocked tape—S-shape locked armor can be supplied in steel or non-ferrous metals.



Okoloom covering—This fire hose weave provides high resistance to abrasion and wear.



Metallic braid for shipboard cables or wherever a light steel, aluminum or copper armor is needed.

OKOLITE CABLES FOR HIGH-VOLTAGE CIRCUITS



Okolite high-voltage wires and cables can be safely operated at all voltages up to 35,000 a.c. On x-ray cables they have been successfully operated at 110,000 volts. Okolite is particularly recommended for such specific conditions as:

High-voltage circuits of almost every type

Interior Wiring

Underground Service

Portable Cables

Station Cables

Apparatus and Equipment Leads

Submarine Cables

Station Control Wiring

Communication Cables

Aerial Cables

Vertical Riser and Shaft Cables

X-ray Cables, Test Leads, Neon Sign Cables,

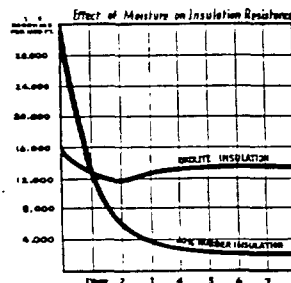
Ignition Wire and other special applications.

Advantages of Okolite

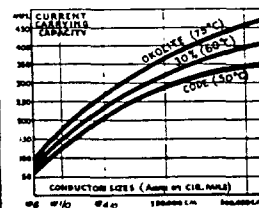
(1) Okolite excels ordinary rubber insulation in providing superior moisture and heat resistance, greater current-carrying capacity, higher breakdown voltage, lower specific inductive capacity. Can be operated at 75° C. (167° F.) copper temperature up to 8000 volts and at 70° C. (158° F.) for higher voltages.

(2) Okolite excels varnished cambric and paper cables, since no lead sheath is needed for many types of installation. Okolite saves weight and cost, eliminates electrolysis and simplifies splicing and terminating. In many cases, Okolite cables require no potheads. In addition, there is no oil or petrolatum to migrate and the dielectric loss is less than for Varnished Cambric.

Diameters and dimensions of Okolite are substantially the same as for Okonite wires shown on previous pages.



Effect of moisture on insulation resistance. The electrical characteristics of Okolite remain unchanged even after long immersion.



Relative continuous carrying capacity per phase of various conductor sizes of Okolite compared with ordinary rubber-insulated cables at 4150-volts.

ROCKBESTOS PERMANENTLY INSULATED WIRES, CABLES AND CORDS

ROCKBESTOS 300-VOLT
HEAT-RESISTING FIXTURE WIRES

The National Electrical Code stipulates that fixtures operating at not more than 300 volts between conductors which may be subject to temperatures in excess of 194° F. (90° C.), must be wired with either Type AF Fixture Wire or Types AFC, AFPO or AFPD Flexible Cord.

Rockbestos Fixture Wire is insulated with pure asbestos, felted and impregnated. It is heat-resisting and fireproof and is approved by the Underwriters' for lighting fixture use.

Single Conductor, Plain, Type AF—Table FS



White Insulation



Black Insulation

Supplied in two styles; plain and braided. The plain type has no braid and is generally employed in fixtures where the wiring is concealed. Supplied in black or white finish. Colors on order.

Single Conductor, Braided, Type AF—Table FS



Solid Color Braid

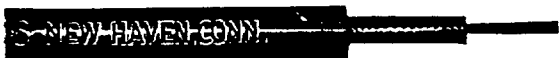


Solid Color Braid with Marker

Cotton or rayon braids are used on the braided type; standard colors mahogany, old gold, and black. Other colors on special order. Polarization accomplished by use of marker thread in braid.

Size A.W.G.	Stranding	Approx. Finished Diam., Inches—			Standard Shpg. Lengths (Ft.)	
		Plain	Rayon Braided	Cotton Braided	Spools	Coils
10	105/30	.225	.240	.255	250	500
12	65/30	.199	.214	.229	250	500
14	41/30	.144	.159	.174	500	1000
16	26/30	.127	.142	.157	500	1000
18	16/30	.113	.128	.143	500	1000

ROCKBESTOS HEATING CABLE—Table LH



This pliable easily formed cable, with its No. 19 AWG nickel chromium conductor insulated with .040" of felted asbestos and covered with a 1/4" waterproof lead sheath, is ideal for the distribution of a mild, controlled heat when hooked up with a thermostat. It may be used to keep water, sewer and wet pipe sprinkler systems from freezing, as well as to maintain temperatures that insure steady flow in conveyor pipes for fuel oil, soap, varnish, ink, chocolate, sulphur, etc. Manufacturers of brooders, soil heating cable kits and other heating devices also find it useful.

ROCKBESTOS 300-VOLT
HEAT-RESISTING FLEXIBLE CORD

Type AFPD—Table FR

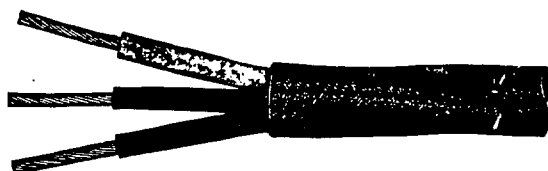


Designed for pendant lighting fixtures requiring a heatproof cord to support the weight of the fixture. The insulation will not dry out or crack at the socket and remains permanently flexible. Supplied with cotton or rayon braid and polarized conductors.

Size A.W.G.	Stranding	Approx. Finished Diam., Inches—		Standard Shpg. Lengths (Ft.) Coils
		Cotton Braid	Rayon Braid	
14	41/30	.318	.303	500
16	26/30	.284	.269	500
18	16/30	.256	.241	500

ROCKBESTOS 300 VOLT TRIPLEX
HEAT RESISTING FLEXIBLE CORD

Underwriters' Type AFPD — Table FC



This Underwriters' approved flexible cord has the same characteristics as the Duplex Cord above but is designed for lighting fixtures having pendant outlet switches, two filament lamp fixtures, three-heat appliances and leads for apparatus, meters and testing. Supplied with black cotton or rayon braid and polarized conductors.

Size A.W.G.	Stranding	Approx. Finished Diam., Inches—		Standard Shpg. Lengths (Ft.) Coils
		Cotton Braid	Rayon Braid	
14	41/30	.340	.325	500
16	26/30	.303	.288	500
18	16/30	.273	.258	500

ROCKBESTOS HEATER CORD

Underwriters' Type HPD



Rockbestos Heater Cord is approved by the Underwriters' Laboratories. Made in two grades, "3,000" and "10,000" cycle. Can be furnished in either 250 or 500 ft. coils. Also available in 250 ft. lengths on spools. Cotton, rayon or heavy duty twine braids.

Size A.W.G.	Stranding	10,000 Stranding	Carrying Capacity Amps.	Standard Shpg. Lengths (Ft.)	
				Spools	Coils
14	105/34	165/36	20	250	250
16	65/34	104/36	15	250	500
18	41/34	65/36	10	250	500

ROCKBESTOS ALL-ASBESTOS RHEOSTAT WIRE—CODE TYPE AIA

Insulated with felted and impregnated asbestos and finished off with a tough, braided asbestos jacket, this rheostat wire is recommended for open wiring on grids and faceplates, around furnaces, heater circuits and wherever else high temperatures will be encountered. Black or white braid as specified. Underwriters' approved.

600-VOLT—SOLID CONDUCTOR—Table A



Size A.W.G.	Bare Diam. Inches	Approx. Finished Diam. Inches	Approx. Net Weight Per M Ft. Pounds	Standard Shipping Lengths (Ft.) Coils	Reels
0000	.460	.670	761		500
000	.410	.620	620		500
00	.365	.575	477		500
0	.325	.535	388		500
1	.289	.500	316		500
2	.258	.430	248		1000
3	.229	.400	202		1000
4	.204	.375	167		1000
5	.182	.355	138		1000
6	.162	.335	121	500	1000
8	.128	.280	79	500	1000
10	.102	.255	58	1000	1500
12	.081	.235	42	1000	1500
14	.064	.215	34	1000	2000
16	.051	.205	28	1000	2000
18	.040	.190	24	1000	2000

ROCKBESTOS ALL-ASBESTOS POWER AND RHEOSTAT CABLE CODE TYPE AIA

600-VOLT—STRANDED CONDUCTOR—Table R



Size C.M.	Stranding	Bare Diam. Inches	Approx. Finished Diam. Inches	Net Lbs. Per M. Ft.	Standard Shpg. Lgths. (Feet) Coils	Reels
1,000,000	61/1280	1.152	1.455	3456		500
900,000	61/1215	1.093	1.395	3126		500
800,000	61/1145	1.031	1.335	2796		500
750,000	61/1109	.998	1.300	2631		500
700,000	61/1071	.964	1.265	2470		500
600,000	61/0992	.893	1.195	2142		500
500,000	37/1162	.814	1.085	1812		500
450,000	37/1103	.772	1.045	1647		500
400,000	37/1040	.728	1.000	1482		500
350,000	37/0973	.681	.955	1317		500
300,000	37/0900	.630	.900	1219		500
250,000	37/0822	.575	.845	982		500
A.W.G.						
0000	19/1055	.528	.770	819		1000
000	19/0940	.470	.710	672		1000
00	19/0837	.418	.660	555		1000
0	19/0745	.373	.615	462		1000
1	19/0664	.332	.575	388		1000
2	7/0974	.292	.505	274		1000
3	7/0867	.260	.470	227		1000
4	7/0772	.232	.445	188		1000
5	7/0688	.206	.420	157		1000
6	7/0612	.184	.395	132	500	1000
8	7/0486	.146	.320	87	500	
10	7/0385	.116	.290	63	500	
12	7/0305	.092	.265	48	1000	
14	7/0242	.073	.225	38	1000	

Underwriters' approved. Specify Table RF for flexible stranded Apparatus or Jumper Cable.

ROCKBESTOS A.V.C.—CODE TYPE AVA BOILER ROOM AND LIGHTING WIRE

For lighting, control and power circuits in conduit or open. Designed especially for boiler rooms, steel mills, circuits around ovens, kilns, and other locations in which wire must withstand high temperatures. Underwriters' approved.

600-VOLT—SOLID CONDUCTOR—Table C



Size A.W.G.	Bare Diam. Inches	Approx. Finished Diam. Inches	Approx. Net Weight Per M Ft. Pounds	Standard Shipping Lengths (Ft.) Coils	Reels
0000	.460	.710	800		500
000	.410	.660	657		500
00	.365	.615	543		500
0	.325	.575	422		500
1	.289	.540	348		1000
2	.258	.480	279		1000
3	.229	.450	231		1000
4	.204	.425	193		1000
5	.182	.405	160		1000
6	.162	.385	138	500	1000
8	.128	.310	87	500	1000
10	.102	.285	62	1000	1500
12	.081	.265	47	1000	1500
14	.064	.245	38	1000	2000
16	.051	.235	31	1000	2000
18	.040	.220	27	1000	2000

The construction illustrated covers sizes 18 AWG to 5. Sizes 5 to 4/0 have an additional layer of felted asbestos next to the conductor. For stranded conductor in this construction, see Table E below which is made in sizes up to 2,000,000 C.M.

ROCKBESTOS A.V.C.—CODE TYPE AVA 600-VOLT POWER CABLE

COARSE STRANDED CONDUCTOR—Table E



Size C.M.	Stranding	Bare Diam. Inches	Approx. Finished Diam. Inches	Net Lbs. Per M. Ft.	Standard Shpg. Lgths. (Feet) Coils	Reels
1,000,000	61/1280	1.152	1.465	3510		500
900,000	61/1215	1.093	1.405	3182		500
800,000	61/1145	1.031	1.345	2854		500
750,000	61/1109	.998	1.310	2689		500
700,000	61/1071	.964	1.275	2524		500
600,000	61/0992	.893	1.205	2193		500
500,000	37/1162	.814	1.115	1860		500
450,000	37/1103	.772	1.075	1692		500
400,000	37/1040	.728	1.030	1525		500
350,000	37/0973	.681	.985	1357		500
300,000	37/0900	.630	.930	1188		500
250,000	37/0822	.575	.875	1017		500
A.W.G.						
0000	19/1055	.528	.780	839		1000
000	19/0940	.470	.720	690		1000
00	19/0837	.418	.670	571		1000
0	19/0745	.373	.625	476		1000
1	19/0664	.332	.585	371		1000
2	7/0974	.292	.515	287		1000
3	7/0867	.260	.480	238		1000
4	7/0772	.232	.455	198		1000
5	7/0688	.206	.430	166		1000
6	7/0612	.184	.405	141	500	1000
8	7/0486	.146	.350	100	500	
10	7/0385	.116	.320	76	500	
12	7/0305	.092	.295	59	1000	
14	7/0242	.073	.275	46	1000	

Underwriters' approved. Also in 1000, 2000, 3000 and 5000 volt constructions.

ROCKBESTOS PERMANENTLY INSULATED WIRES, CABLES AND CORDS

ROCKBESTOS A.V.C.—CODE TYPE AVL
600 VOLT LEAD SHEATHED POWER CABLE

Coarse Stranded Conductor—Table EL



This cable is the same as the standard Rockbestos A.V.C. Power Cable, except that a lead sheath is substituted for the asbestos braid to permit use in lighting, power and control circuits exposed to high temperatures and possible submersion in water. Underwriters' approved.

Size, C.M.	Stranding	Bare Diam. Inches	Approx. Finished Diam. Inches	Net Lbs. Per M. Ft.	Standard Shpg. Lgths. (Feet) Reels
1,000,000	61/1230	1.152	1.560	5613	500
900,000	61/1215	1.093	1.505	5201	500
800,000	61/1145	1.031	1.440	4783	500
750,000	61/1109	.998	1.410	4570	500
700,000	61/1071	.964	1.375	4356	500
650,000	61/1032	.929	1.340	4140	500
600,000	61/0992	.893	1.305	3923	500
550,000	61/0950	.855	1.265	3786	500
500,000	37/1162	.814	1.150	3161	500
450,000	37/1103	.772	1.140	2944	500
400,000	37/1040	.728	1.095	2724	500
350,000	37/0973	.681	1.050	2500	500
300,000	37/0900	.630	1.000	2269	500
250,000	37/0822	.575	.945	2033	500
A.W.G.					
0000	19/1055	.528	.815	1516	1000
000	19/0940	.470	.755	1313	1000
00	19/0837	.418	.705	1144	1000
0	19/0745	.373	.660	1005	1000
1	19/0664	.332	.620	890	1000
2	7/0974	.292	.560	774	1000
3	7/0867	.260	.495	563	1000
4	7/0772	.232	.470	504	1000
5	7/0688	.206	.440	454	1000
6	7/0612	.184	.420	412	1000
8	7/0486	.146	.370	348	1000
10	7/0386	.116	.340	301	1000
12	7/0305	.092	.320	267	1000
14	7/0242	.073	.300	243	1000
16	7/0193	.058	.285	224	1000
18	7/0151	.045	.270	209	1000

ROCKBESTOS A.V.C.—CODE TYPE AVA
600 VOLT MOTOR LEAD CABLE

Flexible Stranded Conductor—Table L



For coil connections, motor and transformer leads; resistant to heat and moisture, vibration, oil, grease, corrosive fumes and flame. Asbestos and varnished cambric insulation and asbestos braid will not dry out, bake brittle, crack, bloom or swell. Underwriters' approved.

Size, A.W.G.*	Stranding Tinned	Bare Diam. Inches	Approx. Finished Diam. Inches	Net Lbs. Per M. Ft.	Standard Shpg. Lgths. (Feet) Coils Reels
0000	259/0286	.600	.850	875	1000
000	259/0255	.536	.785	721	1000
00	259/0227	.477	.720	592	1000
0	259/0202	.424	.675	492	1000
1	259/0180	.378	.630	415	1000
2	133/0224	.336	.560	300	1000
3	133/0199	.299	.520	248	1000
4	133/0177	.266	.490	210	1000
5	133/0155	.237	.460	173	1000
6	133/0141	.212	.435	147	500 1000
8	133/0112	.168	.370	104	500
10	105/010	.120	.320	76	500
12	65/010	.095	.295	59	1000
14	41/010	.075	.275	45	1000
16	26/010	.059	.260	38	1000
18	16/010	.045	.245	32	1000

*Also in C.M. sizes up to 1,000,000 C.M.

ROCKBESTOS A.V.C.—CODE TYPE AVB
600 VOLT SWITCHBOARD WIRE—Table B

U. S. Pat. No. 1,840,282—1,861,404

Rockbestos Switchboard Wire looks like the ordinary multi-layer varnished cambric type, but because it is insulated with the combination of asbestos and varnished cambric it has the added feature of being absolutely flame-proof.

The cushioning action of the felt asbestos also prevents braid-cracking on sharp bends. Standard braids are gray and black, colors or striped patterns on order. Underwriters' approved. For coarse stranded conductor specify Table BS. For Switchboard Bus Cable specify Table P.

Size A.W.G. Tinned	Bare Diam. Inches	Approx. Finished Diam. Inches	Approx. Net Weight per M Ft. Pounds	Standard Shpg. Lengths (Ft.) Coils Reels
8	.128	.270	82	500 1000
10	.102	.245	59	500 1500
12	.081	.220	44	500 2000
14	.064	.200	34	500 2500
16	.051	.190	27	1000 2500
18	.040	.175	23	1000 3000

ROCKBESTOS A.V.C.—CODE TYPE AVB
600 VOLT SWITCHBOARD HINGE CABLE

Flexible Stranded Conductor—Table BH



A companion wire to Rockbestos A.V.C. Switchboard Wire with flexible stranded tinned copper conductor for hinge or jumper connections on swinging panels, connections to swinging synchronizing meters, lamps, etc. Can also be used for conduit wiring where larger diameters cannot be accommodated. Heat, flame and moisture resistant asbestos and varnished cambric insulation covered with gray or black flameproof cotton braids. Solid color braids or striped patterns on order. Approved by the Underwriters.

Size A.W.G.	Stranding Tinned	Bare Diam. Inches	Approx. Finished Diam. Inches	Net Lbs. Per M Ft.	Standard Shpg. Lgths. (Feet) Coils Reels
8	133/0112	.168	.320	89	500 1000
10	105/010	.120	.270	63	500 1500
12	65/010	.095	.245	43	500 2000
14	41/010	.075	.220	34	500 2500
16	26/010	.059	.205	27	1000 2500
18	16/010	.045	.190	22	1000 3000

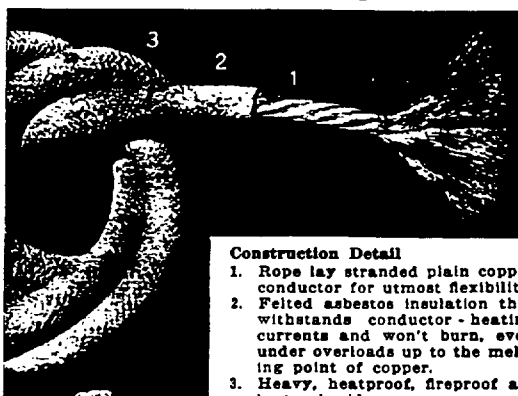
ROCKBESTOS A.V.C. 600 VOLT
MULTI-CONDUCTOR CONTROL CABLE

Designed for use in boiler rooms, power stations, steel mills, etc., under conditions too severe for control cables with other types of insulation which deteriorate rapidly when exposed to high temperatures. It will operate dependably under the attack of heat and moisture, oil, grease or corrosive fumes whether installed open or in conduit as it is insulated with asbestos and varnished cambric and covered with an asbestos braid. Standard strandings AWG No. 9—19/#22 or No. 12—19/#25 in multiples up to and including 19 conductors.

ROCKBESTOS PERMANENTLY INSULATED WIRES, CABLES AND CORDS

ROCKBESTOS EXTRA FLEXIBLE
ALL-ASBESTOS APPARATUS CABLE

300 Volt—Rope Lay Stranding—Table W



Construction Detail

1. Rope lay stranded plain copper conductor for utmost flexibility.
2. Felted asbestos insulation that withstands conductor-heating currents and won't burn, even under overloads up to the melting point of copper.
3. Heavy, heatproof, fireproof asbestos braid.

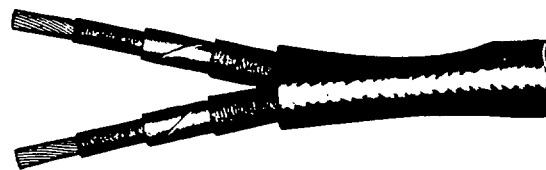
This 300 Volt extra flexible apparatus cable, with rope lay stranded copper conductor, felted asbestos insulation and asbestos braid, was originally designed as feeder cable for movie projector lamp houses, arc lamps, spot lights and effect machines generating extremely high temperatures. It has also been widely used for hinge connections on waffle bakers, grills, roasters, for blueprint machine leads and various heat producing appliances and equipment requiring a heatproof, fireproof cable having rope-like flexibility. Approved as Type AA by the Underwriters' Laboratories.

Size A.W.G.	Stranding	Bare Diam. Inches	Approx. Finished Diam. Inches	Net Lbs. Per M. Ft.	Std. Shpg. Lengths (Feet) Coils
0000	8464/#36	.675	.885	815	150
000	6713/#36	.600	.810	660	150
00	5292/#36	.550	.760	535	150
0	4214/#36	.470	.680	430	200
1	3332/#36	.425	.635	340	200
2	2646/#36	.365	.535	260	200
4	1666/#33	.280	.450	175	250
6	1050/#36	.215	.385	125	500
8	661/#36	.165	.315	80	500
10	413/#36	.130	.280	55	500
12	259/#36	.102	.255	39	1000
14	165/#34	.077	.230	30	1000
16	65/#34	.061	.215	24	1000
18	41/#34	.047	.200	20	1000

ROCKBESTOS 300 VOLT—Code Types AA and
AIA ALL-ASBESTOS STOVE AND RHEOSTAT
WIRE

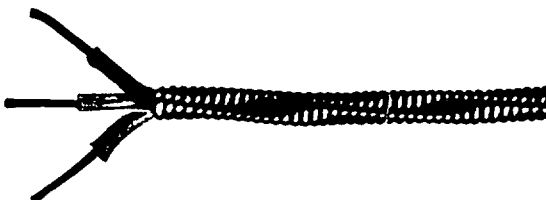
Rockbestos Stove Wire with either solid, stranded or flexible conductor is widely used in cookers, hotplates, ovens, ranges, and other electrical heating devices. Felted asbestos "Hi-Temp" heat and flame resistant or "Moistemp" heat, flame and moisture resistant insulation and asbestos braid in black, white, red, blue or gray. Solid or stranded conductors of copper, monel or nickel.

Size A.W.G.	Bare Diam. Inches	Approx. Finished Diam. Inches	Approx. Net Weight per M. Ft. Pounds	Standard Shpg. Lengths (Ft.) Coils	Standard Shpg. Lengths (Ft.) Reels
8	.128	.280	79	500	1000
10	.102	.255	58	1000	2000
12	.081	.235	42	1000	2000
14	.064	.215	34	1000	2000
16	.051	.205	28	1000	2000
18	.040	.190	24	1000	3000

ROCKBESTOS A.V.C. 600 VOLT
FLEXIBLE CORD — TABLE CV

This cord was originally developed to withstand heat, vibration and moisture in steam locomotive circuits and has since found its way into many other applications. Its laminated A.V.C. impregnated asbestos and varnished cambric insulation, and heat, flame and moisture resistant asbestos braid covering, will not dry out or crack. Recommended for use at operating temperatures up to 110° C. maximum in pendant lighting fixtures in steel mills, boiler rooms, kilns, glass plants, etc. Also for heat developing electrical equipment and high wattage lighting units that may be operated where moisture is prevalent. Approved by Underwriters' with polarized conductors as Type AVPD cord under 300 volt rating. Also made with three conductors. For extremely high temperatures where no moisture is encountered specify similar All-Asbestos constructions, Table CA—Duplex and Table CAC — Triplex.

Size AWG	Stranding Tinned	Approx. Finished Diam. In.	Approx. Net Weight M Ft. Lbs.	Standard Shpg. Lgth. (Ft.) Coils
10	105/30	.535	134	250
12	65/30	.485	101	500
14	41/30	.450	79	500
16	26/30	.420	64	500
18	16/30	.390	41	500

ROCKBESTOS THERMOSTAT
CONTROL WIRE — TABLE TC

This heatproof, fireproof, armored multi-conductor control wire is ideal for low voltage signal and intercommunicating systems, automatic fuel burner control, etc. It is insulated with either .0125", .025" or (for 115 volt service) .031" of felted asbestos, polarized, and steel armored against abrasion and rodents. Made with 2 to 5 conductors in sizes 16, 18 and 20 AWG as listed below.

AWG	Number of Conductors	Approx. Finished Diam. In. Insulation Thickness			Standard Shpg. Lgth. (Ft.) Coils
		.0125"	.025"	.031"	
16	2	.175	.225	.265	500
16	3	.185	.240	.285	500
16	4	.210	.270	.315	500
16	5	.235	.305	.355	500
18	2	.155	.205	.245	500
18	3	.165	.215	.260	500
18	4	.180	.240	.290	500
18	5	.205	.275	.325	500
20	2	.135	.185	.225	500
20	3	.145	.200	.240	500
20	4	.160	.220	.270	500
20	5	.180	.250	.300	500

NATIONAL ELECTRIC STOVE WIRE TYPE AA—ALL-ASBESTOS

Listed by Underwriters' Laboratories, Inc.



Solid copper conductor. Felted asbestos. Asbestos braid. (White flame-and-heat resisting impregnation.)

For use in wiring stoves, ranges, hot-plates and other heating appliances. Suitable for operating temperatures as high as 200° C. (392° F.) in definitely dry places.

Solid Conductor—300 Volts NEMA Standard No. 39-54 Table 14

Size AWG	No. and Size of Strands	Thick- ness Felted Asbestos	Thick- ness Asbestos Braid	*Nominal Over-all Diameter	Approx. Net Wt. Pounds M Feet	Std. Pkg.
18	Solid	.031	.045	.195	21	500C
16	Solid	.031	.045	.205	25	500C
14	Solid	.031	.045	.220	36	500C
12	Solid	.031	.045	.235	46	500C
10	Solid	.031	.045	.255	60	500C
8	Solid	.031	.045	.280	85	500C
6	Solid	.031	.045	.335	118	500R
4	Solid	.031	.045	.375	170	500R

Stranded Conductor—300 Volts NEMA Standard No. 39-54 Table 45

18	7x.0151	.031	.045	.200	21	500C
16	7x.0193	.031	.045	.210	25	500C
14	7x.0242	.031	.045	.225	38	500C
12	7x.0305	.031	.045	.245	48	500C
10	7x.0385	.031	.045	.270	62	500C
8	7x.0486	.031	.045	.300	89	500C
6	7x.0612	.040	.045	.355	123	500R
4	7x.0772	.040	.045	.405	171	500R

*A tolerance of plus or minus 5 per cent is necessary on account of variations in process of manufacture.

Note: Can be furnished with black flame-heat-and-moisture resistant impregnation if moisture is likely to be encountered after the wire is placed in the device. Cable of this construction can be operated up to 125° C. (257° F.).

NATIONAL ELECTRIC FIXTURE WIRE TYPE AF—HEAT-RESISTING—300 VOLTS

Listed by Underwriters' Laboratories, Inc.



Recommended for wiring lighting fixtures, electric ranges, radio apparatus, and as small motor leads. May be subjected to temperatures up to 125° C. (257° F.). Standard colors, plain type—black or white. Braided type—brown, old brass, or black with or without traced in cotton or rayon.

Size A.W.G.	No. and Size of Strands	Felted Asbestos Wall	—Overall Diameter*—			Std. Pkg. Feet (Spool)
			Plain (No Braid)	Glazed Cotton	Rayon	
18	16x30	.031	.107	.135	.120	500
16	26x30	.031	.121	.150	.135	500
14	41x30	.031	.137	.165	.150	500
12	65x30	.040	.175	.205	.190	250
10	105x30	.040	.200	.230	.215	250
18	Solid	.031	.102	.130	.115	500
16	Solid	.031	.113	.145	.130	500
14	Solid	.031	.126	.155	.140	500
12	Solid	.040	.161	.190	.175	250
10	Solid	.040	.182	.210	.195	250

*In accordance with N.E.M.A. Standard and subject to a tolerance of plus or minus 5%.

Multiple conductor Type AFC, AFPO and AFPD assemblies made up with flexible type AF conductors and can be supplied on special order. The color and type of braid covering must be specified.

NATIONAL ELECTRIC APPLIANCE LEAD WIRE

300 VOLT—ALL-ASBESTOS



- (1) Copper Conductor.
(2) Felted Asbestos (Impregnated).
(a) Type A Smokeless (flame-and-heat).
(b) Type A1 moisture-resistant (flame-heat-and-moisture).

Appliance lead wire with smokeless insulation is recommended for wiring electrical appliances such as hot plates and toasters where high temperature and no moisture are encountered. Standard colors — Black, White, Red, Green Gray, Blue or Yellow.

Appliance lead wire with moisture-resisting insulation is recommended for wiring electric ranges, stoves, hot water heaters and other electrical appliances where both heat and moisture resistance are desirable. The insulation is moisture resisting but may smoke at approximately 300° F. Standard colors — same as above.

The above Appliance Lead Wires are available in sizes No. 8 to No. 18 A.W.G., solid or stranded conductor. Complete data on request.

NATIONAL ELECTRIC APPLIANCE GROUNDING WIRE

300 VOLT



- (1) Copper Conductor.
(2) Felted Asbestos (Impregnated with flame-heat-and-moisture saturant).

Recommended for grounding metallic part of stove or electric range to ground wire as required in National Electrical Code. Color — Green.

Size AWG	Number and Size of Strands (Untinned)	Felted Asbestos Wall	Nominal Over-all Diameter	Approx. Net Wt. Lbs. Per M Ft.	Std. Pkg. Coil
14	7/.0242	.015"	.103"	16	1000'

AMERICAN BEAUTY HEATER CORD

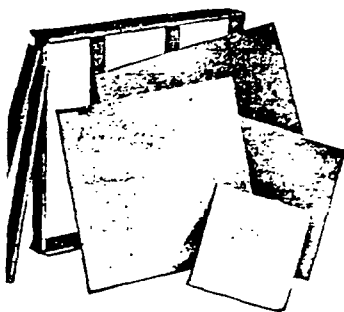


"American Beauty" Nos. 100-GB and 10-X GB are two-conductor heater cord with conductors twisted together under one gold-and-black outer covering. No. 97-RB is two-conductor heater cord, each conductor under separate red-and-black outer covering and then twisted together.

10,000 Cycle (Underwriters' Gold Label)

Cat. No.	Size B&S Gauge	No. of Con- duc- tors	Approx. Wt. Lbs. 1000 Ft.	Std. Pkg.	Price Per 1000 Ft.
100-GB	17	2	45	250-ft. spools	\$56.00
97-RB	17	2	45	250-ft. spools	57.00
10X-GB	16	2	50	250-ft. spools	60.00
103T-GB	17	3	68	250-ft. coils	103.00
94-GB	14	2	55	250-ft. coils	92.00
92-GB	12	2	60	200-ft. coils	162.00
90-GB	10	2	70	200-ft. coils	225.00

STANDARD TRANSITE



Thickness in.	Wt. Lbs. Sq. Ft.		Thickness in.	Wt. Lbs. Sq. Ft.	
	Uncratered	Cratered		Uncratered	Cratered
1/4	2.7	3.1	7/8	9.0	10.4
3/8	3.3	3.9	1	10.3	12.3
1/2	4.0	4.6	1 1/4	12.2	14.2
5/8	5.2	6.0	1 1/2	14.6	18.0
3/4	6.5	7.5	1 3/4	17.0	20.5
1	7.8	9.1	2	19.4	23.0

ASBESTOS EBONY

Thick- ness	Wt. Lb. Sq. Ft.		Thick- ness	Wt. Lb. Sq. Ft.		Thick- ness	Wt. Lb. Sq. Ft.	
	Un- crd.	Crd.		Un- crd.	Crd.		Un- crd.	Crd.
1/8	1.3	1.5	1/8	6.8	7.5	1 1/2	18.4	21.0
1/4	2.0	2.2	1/4	7.9	9.0	2	21.1	24.0
3/8	2.6	3.0	3/8	9.2	10.5	2 1/2	26.0	30.0
1/2	3.4	3.8	1/2	10.6	12.0	3	31.2	36.0
3/4	4.0	4.5	3/4	13.2	15.0	3 1/2	36.4	42.0
1	5.3	6.0	1	15.8	18.0	4	41.5	48.0

ASBESTOS MILLBOARD



Thick- ness Inches	Wt. Lb. Per Sheet	Thick- ness Inches	Wt. Lb. Per Sheet	Inches Thick- ness	Sheet Wt. Lb. Per
1/32	2.5	1/8	9	3/8	25.2
3/64	3.5	5/32	11.3	1/2	32.5
1/16	4.6	3/16	13.3	5/8	40.0
5/64	6	1/4	17.6	3/4	46.6
3/32	7	5/16	21.4		

JOHNS-MANVILLE ASBESTOS PAPER
For Neon-Sign Manufacture

J-M FIBROID ASBESTOS PAPER TAPE



Thickness, Inches			Approx. Lbs. Per 100 Sq. Ft.	Approx. Lin. Ft. Std. Roll 7" Dia.	Approx. Feet 1" Wide Per Lb.
Nomi- nal	Mini- mum	Maxi- mum			
.012	.010	.014	4.2	260	300
.016	.014	.018	6.0	195	200
.018	.016	.020	8.0	175	150
.022	.020	.024	10.0	145	120
.026	.024	.028	12.0	120	100
.029	.027	.032	14.0	110	86
.032	.030	.035	16.0	100	75
.062	.060	.067	32.0	50	37

JOHNS-MANVILLE ASBESTOS LISTINGS

WOVEN TAPE



A fireproof, flexible woven tape suitable for wrapping all forms of wires, cables and coils and for motor and transformer windings. Listings are all closely woven and have a smooth surface with the exception of thicknesses 0.025-inch and lower which have a more open weave than the other styles as a more exact thickness must be maintained. No. 1096, is more closely woven and much stronger than No. 1091.

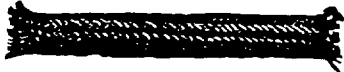
Width, Inches	Underwriter's Grade			Commercial Grade		
	No. 1055 plain, 0.020" thick	No. 1064 plain, 0.025" thick	No. 1065 plain, 1/32" thick	No. 1073 plain, 1/32" thick	No. 1091 wire-in- serted, 1/16" thick	No. 1096 plain, 1/16" thick
	Approximate Feet Per Pound					
1/2	240	166	122	122	64	84
3/4	178	110	82	82	45	56
7/8	161	95	73	73	36	48
1	133	80	65	65	32	42
1 1/4	106	66	54	54	27	34
1 3/8	94	61	48	48	25	31
1 1/2	83	55	43	43	22	28
2	---	41	33	33	17	21
2 1/2	---	---	---	---	13	17
3	---	---	---	---	11	14
	Approximate Feet Per Roll					
1/2	100	100	100	100	100	100
3/4	100	100	100	100	100	100
7/8	100	100	100	100	100	100
1 to 3	150	150	150	150	150	150

JOHNS-MANVILLE ASBESTOS YARNS

Asbestos yarns can be furnished for all purposes where a heat-resisting or fireproof material is required: packing flexible metallic tubing, braiding over wire, etc. Can be furnished commercially pure or higher graded, with or without wire. Prices on request.



J-M ASBESTOS BRAIDED TUBING



Made of commercially pure asbestos yarn braided into tubing 1/8 to 1 1/2 inch. Generally used where a flexible protection against heat, flame or chemicals is desired and where asbestos in tubular form is the most convenient and practical to apply. Waterproofing and insulating compounds may be applied, when ordering state diameter of wire to be covered. Prices on request.

O. Z. INSULATING COMPOUND

Approximate shipping weight, 10 lbs. per gallon. Prices on compound in steel drums will be sent on request.

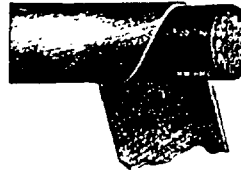


Net Prices Per Gallon

Container Size	Quantity (Gals.)	
	1-9	10 or More
1 Quart	\$1.75	\$1.15
1 Gallon	3.00	2.00
5 Gallon	12.50	8.35

JOHNS-MANVILLE CABLE INSULATION

J-M NIAGRITE



Commercially pure asbestos felted tape, supplied in widths 1 1/2, 2 and 3 in. and in thicknesses of 1/8 in. and 1/4 in. Unless otherwise ordered, 15-ft. rolls will be supplied. Niagrite is furnished in the following four types: Niagrite A, backed with asbestos cloth; Niagrite B, backed with a burlap cloth reinforcement; Niagrite C and Niagrite D, without reinforcement.

Niagrite D is not as high in quality as the other types and, especially when wet, is not as flexible or strong. Niagrite D is supplied only in 1/8-in. thickness, 2 or 3 in. wide. The type most generally selected is Niagrite B, which combines strength with economy.

A thickness of at least two 1/8-in. layers of Niagrite is recommended; the width should approximate the diameter of the cable.

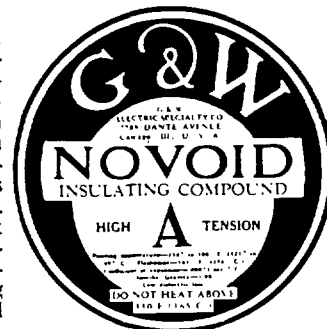
J-M ASBESTOMENT S

J-M Asbestoment S is an efficient refractory material furnished in powder form in 100-lb. bags. Mixed with water, it is applied as an outer protective coating over the Niagrite to a thickness of approximately 1/2 in., or at least 3/8 in. The material weighs 70 lb. per cu. ft., dry. The coverage, 1 in. thick per 100 lbs., is 12 sq. ft. Asbestoment S possesses high arc resistance, excellent workability and adhesive qualities. It is very low in alkalinity, not nearly as alkaline as cement and sand, and is not sensitive to contamination.

The Niagrite-Asbestoment combination consists of an outer refractory coating, which resists the shock of an impinging arc, and a softer inner felt wrapping, which protects the cable from the heat of arcs and manhole fires.

G & W INSULATING COMPOUND

G & W Novoid Insulating Compound is an excellent grade of asphaltic base material suitable for use in potheads, underground cable boxes and cable joints. When handled at the proper temperature a homogeneous dielectric filling with no voids will result.



NOVOID "A"—(Medium soft)—For usual installation of sealed potheads (capnut and disconnecting types).

NOVOID "C"—(Medium hard)—For straight through type potheads having no definite seal. For hot climates and exposures. For cable boxes and splice boxes.

JOHNS-MANVILLE SEALING COMPOUNDS



J-M Sealing Compounds are non-hardening putty-like adhesive materials designed for sealing operations of many kinds. They are easily applied, insoluble in water, will not slump, and will adhere to most clean surfaces. They weigh approximately 100 lbs. per cu. ft. and are furnished in 1 and 5 lb. pugs.

DUXSEAL

An asbestos base plastic sealing compound for electrical and laboratory uses. It is widely used for sealing between strands of copper conductors and as an easily formed water and gas tight plug around cables and wires at points of entry from ducts into manholes or cellars. Safe to use in contact with rubber or synthetic wire insulation — will not affect workmen's hands, metals or paints. Also widely used in laboratories to provide vapor tight connections between extemporized apparatus assemblies and for dams, plaster or lead moulds, etc. Remains plastic and workable between 125° F. and minus 40° F.

UNISEAL

An all-purpose sealing compound especially recommended for outdoor use. Uniseal is particularly effective for sealing duct and box closures, for closing open pipe ends, for smoothing mounting surfaces under street pedestals and for all general glazing and caulking work. It is chemically neutral on lead, brass, copper, galvanized iron, lacquers or varnish. Is not used against rubber. It has low water absorption, completely salvageable and is heat resistant to 200° F.

TRANOLSEAL

A non-slumping sealing compound for oil-filled apparatus. Tranolseal is designed for use against refined oils as employed in transformers, oil switches, etc. It is easily hand worked and may be applied outdoors at any temperature at which workmen can operate. It is highly water and vapor resistant, heat resistant up to 145° F. and has no effect on metals or painted surfaces.

PAKSEAL

An asbestos base sealing compound for ship use and structural concrete work. Aboard ship it is widely used in bulkhead openings to prevent passage of moisture, fumes, vermin or cargo dust. In heavy concrete work it provides rapid and effective sealing of joints between stonework and steel members, window casements and the like. It is plastic and workable between zero and 140° F., will not slump at high temperatures, excellent for weather exposure, metals and painted surfaces and remains plastic internally for years.

G & W CABLE SPLICING KIT



G&W furnishes, usually from stock, unit packages of electric cable splicing material, "Splicing Kits," for all standard and special joints on rubber, varnished cambric and paper insulated (solid type) power and telephone cables.

Each item is supplied in the correct quantity for a properly designed joint.

Time and expense of securing various items from different sources is saved.

Accumulation of dead stock is avoided. No waste.

All materials are kept clean and ready for use.

Each Unit Splicing Kit is labeled for easy identification.

Give complete cable data on inquiries and orders.

Y-ER EAS LUBRICANT FOR PULLING ELECTRIC CABLES



Y-ER EAS (wire ease) is a smooth creamy lubricant which dries rapidly in the air and in so doing shrinks in volume and becomes a light powder. Use on Lead-Rubber-Synthetic covered cables. Do not use on Asbestos covered cables.

Y-ER EAS has no injurious effects on insulation fabrics or conduits and is clean and easy to handle. It is not a grease. It will not spot wood or marble nor will it have any injurious effects on hands or clothing.

Y-ER EAS is packed in heavily paraffined sturdy wooden pails in the following quantities:

2 gal. pail (11 lbs. approx.).....	per pail	\$3.80
3 gal. pail (13 lbs. approx.).....	per pail	4.10
4 gal. pail (19 lbs. approx.).....	per pail	4.60

Y-ER EAS carries the UL and Union labels.

(REVISED 10/23/01)

THE F. D. LAWRENCE ELECTRIC CO. GENERAL LIABILITY INSURANCE POLICY HISTORY 1978-1989*				
DATES (STARTING)	(ENDING)	INSURANCE COMPANY	POLICY NUMBER	GENERAL LIABILITY COVERAGE LIMITS
August 18, 1978	August 18, 1981	Grange Mutual Casualty Co.	MP-11717-01	\$500,000
August 1, 1981	August 1, 1983	Northbrook Property & Casualty Ins. Co. (acquired by St. Paul Cos.)	BPP 0056686	\$500,000
August 1, 1983	August 1, 1986	Federal Ins. Co./Great Northern Ins. Co. (Chubb Group)	3522 70 66	\$500,000
August 1, 1986	August 1, 1988	Midwestern Indemnity Co. (acquired by Indiana Ins. Co.)	61-62257, 61-66686	\$1,000,000
August 1, 1988	August 1, 1989	Liberty Mutual Ins. Co.	TB1-181-044442-028	\$1,000,000

*No policy information is available for periods prior to 1978. After 1989, all policies contain express exclusions for asbestos exposure.