

PLAINTIFF'S
EXHIBIT
WCD-247

October 9, 1987

Zucker, Facher & Zucker
Counsellors At Law
David C. Bandush, Esq.
100 Executive Drive
West Orange, NJ 07052

RE: Donald Macaulay v. Celotex Corp., et als.

Dear David:

Enclosed is a copy of draft answers to standard asbestos
interrogatories to be filed in above matter, duly signed.

Also enclosed is a copy of our Product Bulletin you have
requested.

Thank you for your efforts in this matter.

Very truly yours,

WHITTAKER, CLARK & DANIELS, INC.

George J. Gippold
Executive Vice President

GJB:lab
Enclosures

bcc; Mike Argyelan



CF-BALL-14

EXHIBIT

PENGAD 800-851-6000

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10 Sep 31 1987

ZUCKER, FACHER AND ZUCKER

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

100 EXECUTIVE DRIVE

WEST ORANGE, NEW JERSEY 07052

(201) 736-0444

TELECOPIER (201) 736-4001

SAUL J. ZUCKER (1901-1984)
MORRIS R. ZUCKER
IRWIN L. FACHER
ROGER C. WILSON
PAUL J. SODERMAN
DAVID C. BENDUSH

September 29, 1987

Mr. Mike Argyelan
% Whittaker, Clark & Daniels, Inc.
1000 Coolidge Avenue
South Plainfield, NJ 07080

Re: Macaulay v. Celotex Corp. et als.

Dear Mr. Argyelan:

Enclosed please find copy of draft answers to standard asbestos interrogatories to be filed on behalf of Whittaker, Clark & Daniels in the above matter. I would ask that you review these answers as carefully as possible, particularly those regarding whether or not anyone in your Company has ever testified concerning asbestos, and whether or not you know of any other company to which Whittaker, Clark & Daniels might have sold asbestos in the past.

I would also ask that you provide us with another copy of the "Product Bulletin", referred to in answer B8, which was annexed to the interrogatories filed on your behalf in early 1983 in the case of Sylvester v. Whittaker, Clark & Daniels.

I must emphasize the necessity for a timely response regarding these interrogatories because of the potential for a trial of this matter on October 13, 1987. In addition, I believe that the sooner I am able to forward these answers to plaintiffs' counsel, the sooner and more likely we are to be able to get out of this case before trial as I mentioned to you in my letter of last week.

Please also notice that I have enclosed a certification page at the back of the answers to interrogatories which has been left blank intentionally so that you may determine who is most qualified, or you most want to answer these interrogatories. Simply have your secretary type the name below the signature line and have the appropriate person sign on the line. If you have any questions or need any assistance, please do not hesitate to call me.

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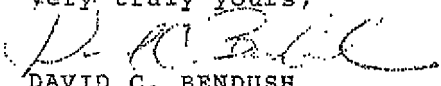
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Re: Macaulay v. Celotex Corp., et als.

I have also enclosed several sheets of yellow paper. If you find that any of the answers are not completely accurate, or need to be changed or modified in any way, please make the necessary corrections on the yellow paper and return same to us, together with the answers to interrogatories.

As always, I will keep in touch and advise you of any and all pertinent developments as they occur.

Very truly yours,


DAVID C. BENDUSH
For the Firm

DCB:mm

Enc.

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TELECOPIER (201) 736-4011

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DAVID C. BENDISH

September 28, 1987

Garruto, Galex & Cantor, Esqs.

Att: Jane B. Cantor, Esq.

P. O. Box 308

East Brunswick, NJ 08816-0308

Re: Donald Macaulay v. Celotex Corp., et als.

Dear Ms. Cantor:

The defendant, Whittaker, Clark & Daniels, hereby provides answers to the standard set of defendant interrogatories. This defendant does not answer Group A since no jurisdiction defense is being raised by it. The following constitutes the answers to Interrogatories.

B1. George Dippold, Vice President Whittaker, Clark & Daniels, South Plainfield, New Jersey.

(A) George Dippold, Vice President of Whittaker, Clark & Daniels, South Plainfield, New Jersey; Clarence Clark, 80 Celestial Way, Juno Beach, Florida (former employee of Whittaker, Clark & Daniels)

B2. Marketing and Distribution of functional pigments and colors.

B3. 1890.

B4(a) Yes. (b1) Whittaker, Clark & Daniels distributed asbestos products for Asbestos Corporation Limited of Thetford Mines, Quebec, Canada. (2) The relationship began sometime during the 1930s, the exact date of which is unknown and there are no records available to establish the exact time when the relationship began; it terminated sometime in the late 1960s or early 1970s, again with no records available to be more specific as to the date of termination. (3 and 4) the following are a list of the officers and directors of the corporation: Fred Roesch, chairman; Dick Light, president; George Dippold, executive vice president; Bill Hobson, vice president; Clarence Clark and Clarence Driscoll, directors; Mike Argyelan, secretary-treasurer; Florian J. Hailer, Jr., vice president; Julia R. Pabst, assistant secretary.

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B5. None.

B6. No.

B7. No.

B8. Yes, see Product Bulletin annexed hereto.

B9. No.

B10. No.

B11. Yes.

B12. Yes.

B13. Yes, the minutes are in the custody of Mr. Mike Argyelan at the company headquarters in South Plainfield, New Jersey.

B14. Yes, Whittaker, Clark & Daniels has distributed asbestos.

B15. Whittaker, Clark & Daniels did not use asbestos in any of its products but merely sold it in the containers in which it was received from Asbestos Corporation Limited.

B16. No.

B17. N/A

B18. (a) This defendant believes that it commenced distributing asbestos sometime during the 1930s.

(b) Sometime during the late 1960s or early 1970s.

(c) Generally throughout New Jersey, but there are no records available to accurately show the locations where the product was sold.

B19. No.

(a,b,c and d not applicable).

B20. N/A

B21. No.

B22. Yes, a limited one; (a) in the laboratory; (b) see attached list; (c) for general use; (d) not a formal one.

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Re: Donald Macaulay v. Celotex Corp., et als.

B23. No.

B24. No.

B25. No.

B26. The only awareness was an academic awareness which was gained by reading newspapers, magazines and the like.

B27. No.

B28. No.

B29. No.

B30. N/A

B31. N/A

B32. N/A

B33. No.

B34. No.

B35. No.

B36. This defendant generally became aware of the problems dealing with asbestos through the media and other readings during the late 1960s and early 1970s.

B37. This defendant has no information with respect to causal relationship between asbestos and disease or illness.

B38. N/A

B39. Not to the best of our knowledge.

B40. No.

B41. N/A

B42. N/A

B43. All persons named in these answers to interrogatories and any other party's interrogatory answers.

B44. To be supplied.

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Re: Donald Macaulay v. Celotex Corp., et als.

- B45. This defendant has no independent knowledge, but shall rely upon claims asserted by other defendants involved in this litigation.
- B46. This defendant has no such knowledge, but shall rely upon proofs adduced by other parties to this litigation.
- B47. This defendant has no such knowledge, but shall rely upon proofs adduced by other parties to this litigation.
- B48. No.
- B49. This defendant does contend that the plaintiffs should have been aware of the dangers of working with asbestos if such dangers existed. The information should have been imparted to them by their employers or by those who manufactured the asbestos products.
- B50. This defendant has no such knowledge, except to state that asbestos dust has been known to cause certain problems and that the use of respirators have been available to all people working with the product.
- C1. No.
(a) As stated above, Whittaker, Clark & Daniels carried asbestos for resale to other businesses beginning sometime in the 1930s and terminating in the late 1960s or early 1970s.
(b) Asbestos Corporation Limited, Thetford Mines, Quebec;
(c) The asbestos was only sold to other companies, and was not utilized by Whittaker, Clark & Daniels.
(d) Do not know.
- C2. Yes.
(a) South Kearny, New Jersey, only for the distribution of asbestos fibers;
(b) See answer to C1a;
(c) This defendant does not now, nor has it ever, produced any asbestos products.
- C3. This question cannot be answered by the defendant since this defendant only distributed the raw asbestos fiber to other companies.
- C4. N/A
- C5. N/A
- C6. Inasmuch as this defendant does not have any records at the current time, this question cannot be answered definitively. However, Quigley Company has claimed that asbestos fibers were sold by Whittaker, Clark & Daniels to it and Quigley has not yet furnished Whittaker, Clark & Daniels with any records as to the amount sold and when.

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C7. See answer to C6.

C8. No.

C9. Yes.

(a) Raw asbestos;

(b) Essentially because it was not a large part of our business and because there were increasing reports that the use of asbestos could be dangerous;

(c) The late 1960s or early 1970s.

C18. No.

C19. No.

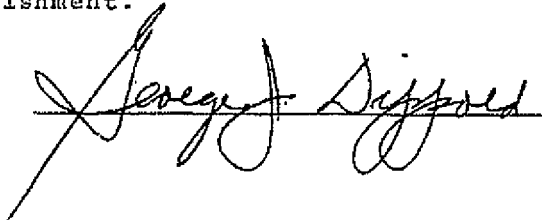
C20. No.

C21. No.

ZUCKER, FACHER AND ZUCKER

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Re: Donald Macaulay v. Celotex Corp., et als.

I certify that the foregoing statements made by me are true.
I am aware that if any of the foregoing statements made by me are
wilfully false, I am subject to punishment.

A handwritten signature in cursive script, reading "Steven J. Diggold", written over a horizontal line.

Defendants Interrogatories Form B

To be answered by all defendant and third party defendant miners, manufacturers, suppliers and installers of asbestos or asbestos containing products in all cases except in Johns-Manville plant worker cases where Johns-Manville defendants will answer a separate set of interrogatories.

Instructions

- Group A: Questions need not be answered unless defendant has raised a jurisdictional defense in its answers and intends to press said defense in accordance with *R. 4:6-3*.
- Group B: Questions in this group have time limits imposed concerning the scope.
- Group C: Questions in this group have time limits imposed concerning the scope of the information sought. The time reference is two years before plaintiff's earliest employment as alleged in the complaint up to the date of termination as alleged in the complaint. Where the complaint names more than one plaintiff the time reference is two years before the earliest date of employment by any plaintiff and the latest date of termination as to any such plaintiff.

Where reference is made in the question to plaintiff's employer, defendant is instructed to refer to the complaint for an identification of plaintiff's employer.

Answers to interrogatories in this form shall be provided and served within 120 days of the date of demand.

- A.1. Where is defendant's corporate headquarters located?
- A.2. Set forth the state in which defendant is incorporated in and the date of its incorporation there.
- A.3. Has defendant ever been incorporated under the law of the State of New Jersey? If so, set forth the inclusive dates the defendant was incorporated here.
- A.4. Has defendant ever maintained an office in the State of New Jersey? If so, indicate where this office was located and set forth the inclusive dates of its operation here and describe what function it served. In addition, set forth names, addresses and job positions of the individuals who staffed the office.
- a. Describe the type of business defendant did in New Jersey.

- A.5. Does defendant have an agent or representative in New Jersey who is authorized to accept service of process on its behalf? If so, identify each such agent or representative, indicate their respective addresses and set forth the dates during which this function is or was performed.
- A.6. Has defendant ever had an agent or representative in New Jersey who was authorized to accept service of process on its behalf? If so, identify each such agent or representative, indicate what their respective addresses were and set forth the dates during which this function was performed.
- A.7. State the name and address of defendant's corporate officers and indicate the respective offices they hold.
- A.8. Has defendant ever done business in the State of New Jersey?

A.9. If the answer to the previous interrogatory is in the affirmative, state:

- a. The inclusive dates the defendant did do business in the State of New Jersey; and
- b. Where in New Jersey it did business.

A.10. Set forth the following about each entity supplied in your answer to Interrogatory B4:

- a. The State or County of each entity's incorporation; and
- b. The corporate business headquarters of each entity from the date it was established until the present.

B.1. State the name, address and job position of each and every individual signing these interrogatories on behalf of the defendant.

a. State the name, address and employer and job position of each person, whether defendant's employees or otherwise who was consulted with or who assisted in the answering of these interrogatories.

B.2. Give a full and detailed description of the nature of the business that your company is engaged in.

B.3. When did your company commence its business?

B.4. a. Are or have any of defendant's predecessors, affiliates, subsidiaries, or parent corporations engaged in the mining, sale and distribution of asbestos and/or asbestos fiber and/or asbestos containing insulation products? If so, state the name of each such entity, describe the nature of the involvement that each entity has or has had in the mining, distribution or sale of these products and materials, and set forth the inclusive dates each was involved in each aspect of this business.

b. As to each such entity referred to in (a) above, state:

1. The relationship between defendant and each such entity;

2. The date each such relationship began and terminated;
 3. The names and addresses of each such entity's corporate officers and Board of Directors; and
 4. The names and addresses of your corporate officers and Board of Directors.
- B.5. From the year 1925 until the present, identify and state the address of any organization in which defendant, its officers, agents or employees have belonged, having anything to do with setting standards, regulations or the conducting of research into the use of asbestos, asbestos products or asbestos fiber.
- B.6. Has defendant ever been a member of or affiliated with any trade groups, professional associates or organization? If so, identify each such group, association or organization and set forth the inclusive dates of defendant's membership in each.
- B.7. Has defendant ever been a member of or affiliated with the Asbestos Textile Institute? If so, indicate when your company was affiliated or was a member of this organization.

- B.8. Does your company publish or distribute a manual or booklet which describes the nature of the business that defendant is engaged in? If so, set forth the title of such manual or booklet, indicate when it was published and attach a copy of same hereto.
- B.9. Has any employee or representative of your cooperation ever attended a conference or meeting of the Asbestos Textile Institute? If so, identify each such individual who attended these conferences or meetings and set forth the dates on which each such individual went to such a conference or meeting.
- B.10. Has your company ever been a member of, been affiliated with or provided funding for the Industrial Hygiene Foundation? If so, indicate when your company was a member or affiliate of this organization and set forth the dates, if applicable, when you provided funding to this organization.
- B.11. Does your company have a Board of Directors?
- B.12. Does your company's Board of Directors conduct meetings?
- B.13. Have minutes of the Board of Directors meetings been taken and maintained by your company? If so, indicate who has custody of the minutes at this time.

- B.14. Has your company, and/or its subsidiaries or affiliates ever manufactured or distributed asbestos containing products?
- B.15. Give a complete and detailed description of the particular qualities that asbestos has or had that caused your company and/or its subsidiary or affiliate to utilize asbestos in your products.
- B. 16. Did any of the entities from whom you received asbestos fiber or any of the entities referred to in B6, B7, B9 and B10 ever inform you or your company's employees that asbestos was potentially hazardous to the health of individuals who were exposed to it?
- B.17. If so, for each such company that transmitted such information to you and your company, set forth the following information.
- a. The name of each and every entity that informed your company that asbestos was potentially hazardous to health;
 - b. The dates you received this information from each such company;
 - c. Indicate how this information was transmitted to you;
 - d. The substance of each warning; and

- e. Annex hereto copies of each such warning.

B.18. Has defendant distributed or sold asbestos or asbestos containing products in the State of New Jersey? If so, set forth the following information:

- a. The date that defendant commenced selling asbestos or asbestos containing products in the State of New Jersey;
- b. The date the defendant terminated the sale of asbestos or asbestos containing products in the State of New Jersey; and
- c. The areas of New Jersey where asbestos or asbestos containing products were sold.

B.19. Did defendant ever affix any warnings to any of the asbestos or asbestos containing products it marketed and distributed? If so for each such product that contained a warning set forth the following information:

- a. The brand and trade name of each such product that contained a warning;
- b. The date a warning was attached to each such product;

- c. The substance of each warning; and
 - d. Annex hereto copies of each such warning.
- B.20. Set forth the name, address and job position of each and every individual who took part in your company's decision to place a warning on its asbestos or asbestos containing products.
- B.21. Prior to 1964, did any employee of the defendant ever recommend that it utilize a warning on its asbestos containing products? If so, identify each such employee, indicate when he made such a recommendation, indicate what the recommendation was, to whom it was given and what action was taken thereon.
- B.22. Has defendant ever established or maintained a library or libraries which in any way dealt with industrial hygiene, medicine, safety and engineering? If so, state:
 - a. Where the library was or is located;
 - b. The names of all journals which that library subscribed to;
 - c. For whom and for what purpose the library was established; and

- d. Whether there is an inventory of the books and publications which are or were housed in this library, and if so, attach a copy hereto.

B.23. Did defendant or its agents or employees ever make any effort to keep abreast of medical literature concerning potential health hazards posed by the use of and/or exposure to asbestos? Indicate the name, addresses and job positions of all your company's employees who reviewed this literature.

B.24. Prior to 1964 had your company done any studies or tests or had your company participated in, been the subject of, or been aware of any studies or tests by others concerning the potential effects of inhalation of asbestos dust or fibers by one using or being exposed to asbestos or asbestos containing products. If so, state:

- a. The date each study or test was conducted and the date defendant became aware of said study or test;
- b. The names and addresses of the persons conducting each test or study;
- c. The purpose of the study or test;
- d. The results of each study or test; and
- e. If reduced to writing attach a copy hereto.

B.25. Prior to 1964, did defendant's agents or employees conduct any experiments with laboratory animals to determine whether or not its asbestos containing products were potentially hazardous to the health of workers who were using them? If so, for each such experiment which was conducted, indicate who conducted it, state when it was conducted and describe the results of each such experiment.

B.26. Since 1964 has your company done any studies or tests or has your company participated in, been the subject of, or been aware of any studies by others concerning the effects of inhalation of asbestos dust and fibers by one using or being exposed to asbestos or asbestos containing products? If so, state the following:

- a. The date each such study or test was conducted and the date defendant became aware of said study or test;
- b. The names and addresses of persons conducting the tests or studies;
- c. The purpose of the tests;
- d. The results of each test or study; and
- e. Attach a copy of any reports based upon each study or test.

B.27. Since 1964, has defendant or its agents or employees sponsored or performed any laboratory experiments with animals to determine whether or not its asbestos containing products were potentially hazardous to the health of workers who were using them? If so, state who conducted each study, indicate where each study was conducted, and describe what the results of each test were.

B.28. Prior to 1964, did defendant or its agents or employees ever go out to construction sites, factories or power houses where its asbestos or asbestos containing products were being used to determine or measure the levels of asbestos dust or fibers in the work environment? If so, for each such study or experiment that was conducted, set forth the following information:

- a. When and where each measurement, study or test was conducted;
- b. Who conducted each measurement, study or test;
- c. What types of equipment were utilized to measure the levels of asbestos dust or fibers in the air;
- d. What the results of each measurement, test or study were; and
- e. Attach a copy of any reports concerning the measurements, tests or studies.

B.29. Since 1964, has defendant and/or its agents or employees ever gone out to any construction sites, factories or power houses where its asbestos or asbestos containing products were being used to determine the levels of asbestos dust or fibers which were in the work environment? If so, for each study or experiment which was conducted, set forth the following information:

- a. Who conducted each measurement, study or test;
- b. When and where each measurement, study or test was conducted;
- c. What type of equipment was utilized to measure the levels of asbestos in the working environment;
- d. What the results of each study, measurement or test were; and
- e. Attach a copy of any report concerning each measurement, study or test.

B.30. Give a complete description of all programs implemented and precautions taken by the defendant at its plants and facilities where it manufactures asbestos or asbestos containing products to reduce the levels of asbestos dust and fibers in the air. Include in this description all programs implemented and precautions taken since each plant was in operation. Include in this answer the date that each precaution was taken or procedure was implemented.

B.31. Did defendant at any time require its employees who worked in the manufacture of asbestos or asbestos containing products to wear respirators, face masks or other protective devices? If so, set forth which employee (by type) was required to wear such

protective devices, when the directive relative to same was issued for each type of employee and specify what type of device was to be worn by each type of employee.

B.32. Give a complete explanation of why each and every employee set forth in the preceding answer was required to wear a respirator, face mask or other protective device while working with asbestos.

B.33. Has any worker employed by your company, its subsidiaries or affiliates ever filed a worker's compensation claim against defendant or its predecessors, affiliates or subsidiaries, for an occupational disease or condition which was allegedly caused by exposure to asbestos, asbestos products, asbestos dust or fibers? If so, set forth:

- a. The date each claim was made;
- b. Where each claim was made;
- c. The name and address of the party making the claim; and
- d. The name and address of the party against whom the claim was made.

B.34. If any employee or officer of defendant has testified at trial or by deposition in any litigation involving an alleged occupational exposure to asbestos, state:

- a. Name, address and title of each such person who testified;

b. Date, location and form of testimony; and

c. Whether defendant has a copy of such testimony.

B.35. Has defendant at any time since its inception, maintained any office or department dealing with medical research? If so, state:

a. The name of each such department;

b. The dates each such department was in operation; and

c. The name, address and job position of each such person who has been in charge of said department or departments.

B.36. When was the first time the defendant became aware of or knowledgeable of any disease or illness associated with or causally related to the inhalation of asbestos, asbestos fibers or asbestos dust in any form whatsoever? Indicate which disease defendant became aware of and describe how defendant became aware of its alleged relationship to inhalation or exposure to asbestos.

B.37. In reference to the preceding interrogatory, if defendant acknowledges a casual relationship between asbestos and disease or illness, set forth the following information:

- a. What diseases or illnesses defendant acknowledges are causally related to or associated with exposure to asbestos dust or fibers;
- b. The date upon which defendant became aware of the association with or casual relation to each such disease or illness;
- c. The date upon which defendant confirmed the casual relation of each such disease to exposure to asbestos dust or fibers; and
- d. How defendant became aware of each such casual relationship or association, indicating the source of all such information.

B.38. If your company manufactured any products which contained asbestos and which were commonly used by insulation workers and pipe coverers, describe how the following products were cut, shaped, mixed and applied when used:

- a. Asbestos cement;

b. Asbestos containing pipe covering;

c. Asbestos sheeting; and

d. Asbestos insulation to cover extremes of heat as well as cold.

B.39. Prior to 1964, were there any memoranda written by, distributed, or circulated among defendant's employees, agents or representatives concerning the potential health hazards concerned with asbestos containing products? If so, state:

a. Dates of each memorandum;

b. Name, address and job position of each individual who wrote each memorandum;

c. Name and address and job position of each individual to whom the memorandum was directed;

d. Where each memorandum is kept; and

- e. Attach copies of each memorandum hereto.
-
- B.40. Has defendant or its predecessor corporations ever had a division, affiliate or subsidiary which was involved in contracting for or installation of asbestos-containing materials in New Jersey? If so, for each such entity involved in the contracting or installation of these products, set forth the following information:
 - a. Name of each such entity and the nature of its relationship to the parent corporation; and
 - b. The exclusive dates that each of the above mentioned entities were in existence.
 - B.41. Did defendant ever provide any of the employees who worked in the contracting for or installation of asbestos containing materials with any respirators, face masks or protective clothing? If so, indicate what types of protective clothing, respirators or face masks were provided, describe when each type was first provided to each employee and describe why they were provided to each type of employee.
 - B.42. Has any individual who was ever employed in the contracting and insulation business referred to above ever filed a claim for workmen's compensation because of an alleged occupational disease sustained allegedly because of occupational exposure to asbestos? If so, for each such employee who has filed a claim set forth the following information:
 - a. Name of each such employee;
 - b. When each claim was filed;

c. Where each claim was filed; and

d. Name of the attorney who represented the petitioner and respondent.

B.43. State the full name, job title and present residences, business and professional addresses of any and all persons who have knowledge of any relevant facts relating to this case and the defense of your company. Unless already set forth in answers to a prior question, set forth in detail the facts of which each person allegedly has knowledge.

B.44. State the name, address and credentials of each and every expert witness you intend to utilize at the time of trial, and annex hereto a copy of their report.

B.45. Do you contend that the plaintiff's illness is a consequence of the negligence or the fault of a third party or anyone who is not a party to this action? If so, state the name and address of each such party and set forth all facts which support your contention.

B.46. Do you contend that the illness and/or death of the decedent in this action was not causally related to an occupational exposure to asbestos dust and fibers? If so, give a full and detailed description of your contentions.

B.47. Do you contend that other agents and/or substances caused the illness and/or death of the plaintiff in this matter? If so, identify each such agent and/or substance and set forth all facts to support your contentions.

B.48. Has defendant and/or its agents or employees obtained any statements from anyone who had knowledge of the facts surrounding this cause of action? If so, set forth:

a. Name, address and job position of the person that obtained the statement;

b. The name, address and job position of the person who gave the statement;

c. The date the statement was given; and

d. Whether the statement is in writing, and if so, who has custody of it.

B.49. Does defendant contend that plaintiff or plaintiff's decedent suffered injuries and/or death due to his own negligence? If so, set forth all facts which support your contentions.

B.50. Does defendant contend that plaintiff or plaintiff's decedent failed to use defendant's asbestos or asbestos containing products properly? If so, set forth all facts which support your contentions.

C.1. Has defendant and/or its affiliates or subsidiaries purchased asbestos fiber for use in its business or for manufacturing its products? If so, set forth the following information:

- a. The inclusive dates that your company purchased asbestos fiber;
- b. The name and address of each and every entity that you purchased the asbestos fiber from;
- c. The nature and types of products that your company used asbestos fiber for; and
- d. The type of asbestos fiber that your company purchased.

C.2. Does defendant have or has it had any plants, factories or production facilities located in the State of New Jersey which were or are engaged in the importation, manufacture, processing, converting, compounding, packaging, distribution, and/or sale of asbestos, asbestos containing products and/or asbestos containing insulation products? If so, for each such plant, factory or facility which is or has been located in New Jersey, set forth the following information;

- a. The name and address of each such plant, factory or production facility;
- b. The inclusive dates that each plant, factory or facility existed; and

- c. A complete and detailed description of all products that each plant, factory or production facility was engaged in producing (include in your description the type of product and its generic and trade name).
- C.3. Indicate which asbestos products and asbestos materials manufactured and distributed by the defendant are or were classified as "insulating materials."
- C.4. With reference to the preceding question, give a full and complete description of the purposes for which defendant's asbestos containing insulating materials were designed.
- C.5. Set forth the name and address of each and every entity that your company purchased or received asbestos fiber from which was utilized in the manufacture of your company's asbestos containing insulation products. Include in your answer the inclusive dates that your company purchased asbestos from each such entity.
- C.6. As to any asbestos products or raw asbestos mined, converted, fabricated, produced, compounded, manufactured, processed, sold or distributed by defendant, state whether any was shipped or sold to plaintiff's employer in New Jersey either directly or through a third party, stating which.

C.7. If the answer to C6 is in the affirmative, state as to each asbestos product, or raw asbestos:

- a. Exactly what product(s) or type(s) of asbestos was (were) shipped or sold to plaintiff's employer;
- b. The dates and quantities of each such product shipped or sold;
- c. Whether any warnings, cautions, caveats or directions accompanied the materials so shipped, the date these appeared and the exact wordings of the warnings, cautions, caveats or directions and where the warnings, cautions, caveats or directions appeared;
- d. The name and address of any intermediate supplier or distributor who sold this defendant's products to plaintiff's employer during the period referred to above;
- e. Did your company affix its corporate logo or insignia on the packages of asbestos containing insulation products that it distributed and sold? If so, describe the type of logo or insignia which was used, indicate which products it was affixed to, and set forth the inclusive dates that each insignia or logo was utilized. Annex hereto a photograph or copy of each such logo described in this matter; and
- f. Please describe in detail the type of packages in which defendant has sold, distributed or manufactured asbestos material, listing the dates each type of package was used, a physical description thereof and description of any printed material or trademark that appeared thereon.

C.8. Have any of the products listed in Interrogatory C7 above been altered in chemical composition since being marketed? If so, set forth the following information:

- a. The date of each alteration;
- b. A detailed description of the nature of each alteration; and
- c. The reason for such alteration.

C.9. Have you discontinued manufacturing and/or distributing and/or supplying or selling any asbestos or asbestos products referred to in C7. If so, set forth the following information:

- a. What such product is;
- b. The reasons therefor; and
- c. When the discontinuance took place.

If your answer to C6 is either "No" or "Unknown" but your answer to B14 is "Yes" provide answers to C10 through C18. Otherwise you may proceed to C19.

- C.10. Give a complete and detailed description of each and every asbestos containing product that your company has designed, manufactured and distributed into the stream of commerce. Include in your description the trade, brand and generic names of each such product and indicate the type and amount of asbestos that was contained in each particular product. Include in this answer the inclusive dates that each particular product was manufactured and distributed.
- C.11. With reference to your answer to B18 state the names and addresses of the entities to whom the products were sold.
- C.12. Did your company and/or its affiliates or subsidiaries do business with or utilize any distributors in the State of New Jersey for purposes of selling or installing its asbestos products? If so, identify each such entity, indicate and describe the nature of the business that you did with each such entity, and set forth the dates this business relationship existed.
- C.13. Has your company ever employed any employees or salesmen whose responsibility it was to sell your company's asbestos containing products to a geographical area encompassing the State of New Jersey? If so, for each such employee or salesman who worked for your company, indicate the dates of his employment, his name and address.

- C.14. Give a complete and detailed description of the manner in which your company packaged each of the asbestos containing products that it manufactured and/or distributed in the State of New Jersey. Include in your description the type of packaging which was used and the material each type of packaging was comprised of.
- C.15. Did your company affix its corporate logo or insignia on the packages of asbestos containing products that it distributed and sold in the State of New Jersey? If so, describe the type of logo or insignia which was used, indicate which products it was affixed to, and set forth the inclusive dates that each insignia or logo was utilized. Annex hereto a photograph or copy of each such logo described in this answer.
- C.16. Did the packages or containers for the asbestos containing products that your company sold or distributed in the State of New Jersey contain any writing or labels? If so, for each such package or container which contained a label, set forth the following information about the writing on the package or label.
- a. The size of each label;
 - b. The substance of all writing on the label;
 - c. The inclusive dates that each writing or label appeared on each type of product; and
 - d. Annex hereto copies of or photographs of each such label that your company used.

- C.17. Give a complete and detailed description of each and every asbestos containing product that your company has designed, manufactured and distributed into the stream of commerce. Include in your description the trade, brand and generic names of each such product and indicate the type and amount of asbestos that was contained in each particular product. Include in this answer the inclusive dates that each particular product was manufactured and distributed.
- C.18. During the years that your company manufactured and/or sold asbestos containing materials, did your company prepare and/or publish any sales or promotional literature which depicted and describe there products? If so, describe the particular literature which your company prepared and indicate the information the literature contained. Describe who has custody of this literature at the present time.
- C.19. Has your company manufactured asbestos containing products and materials which were distributed by another entity or corporation under this name or trademark? If so, identify each such entity which sold or distributed these products, indicate which of your company's products this company marketed and indicate the inclusive dates that this particular commercial arrangement existed.

- C.20. Has your company marketed under its own name or trademark any asbestos containing insulation products which were manufactured by another corporation? If so, identify each and every product which your company marketed which was manufactured by another corporation, indicate the inclusive dates that you marketed each product and describe the name, trade name and generic name of each such product which your company marketed.
- C.21. Were any of the asbestos containing insulation products that defendant sold or distributed into the stream of commerce accompanied by written instructions or package inserts? If so, indicate which such products were provided with such instructions and package inserts, indicate when each product was accompanied by these materials, state the substance of what the instructions or package inserts stated and annex copies of same hereto.