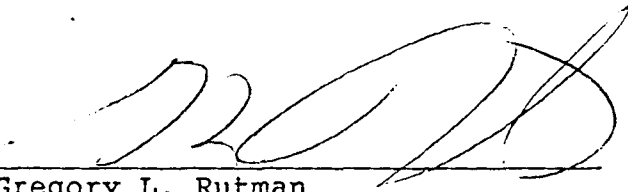


STATE OF OHIO)
) SS
CUYAHOGA COUNTY)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

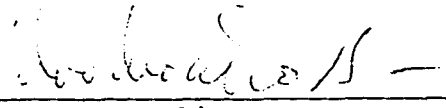
Mary A. Dendinger, et al.,) Case No. C87-7117
)
 Plaintiffs,)
)
vs.)
)
Chrysler Plastic Products)
Corporation, et al.,)
)
 Defendants.)

I, Gregory L. Rutman, being duly sworn, state that I am Assistant Secretary of The B.F. Goodrich Company; that the responses to plaintiffs' request for production of documents are not based upon my personal knowledge but are based upon information contained in regular business records and upon information received from other employees; and that the responses to plaintiffs' request for production of documents are true and correct to the best of my knowledge and information.



Gregory L. Rutman
Assistant Secretary
The B.F. Goodrich Company
6100 Oak Tree Boulevard
Cleveland, OH 44131
(216) 447-6001

Subscribed and sworn to before me this 8th day of December, 1988.



Notary Public

klw/2712k

WOODROW W. BAN, Notary Public
STATE OF OHIO
Attorney Lifetime Commission
Recorded in Lake and
Cuyahoga Counties

21357001

[illegible]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Mary A. Dendinger, et al.,)
)
 Plaintiffs,)
)
vs.)
)
Chrysler Plastic Products)
Corporation, et al.,)
)
 Defendants.)

I, Gregory L. Rutman, being duly sworn, state that I am Assistant Secretary of The B.F. Goodrich Company; that the foregoing Answers to Interrogatories are not based upon my personal knowledge but are based upon information contained in regular business records and upon information received from other employees; and that the foregoing Answers to Interrogatories are true and correct to the best of my knowledge and information.

Gregory L. Rutman -
Assistant Secretary
The B.F. Goodrich Company
6100 Oak Tree Boulevard
Cleveland, OH 44131
(216) 447-6001

Subscribed and sworn to before me this 8th day of December,
1988.

W. H. Smith
Notary Public

klw/2712k

WOODROW W. BAN, Notary Public
STATE OF OHIO
Attorney, License Commission
Recorded in Lake and
Cuyahoga Counties

21357002

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PLEASE DELIVER THESE TELECOPIED PAGES IMMEDIATELY:

TO: Mr. Woodrow W. Bar, Esq.
FROM: Andrew K. Ranazzi
RE: Dandinger v. Chrysler Plastic Products
DATE: 12-7-88

NUMBER OF PAGES TO FOLLOW (INCLUDING COVER SHEET): 12

IF YOU DO NOT RECEIVE ANY OF THE PAGES PROPERLY, PLEASE CALL ME

AS SOON AS POSSIBLE AT (419) 247-2651.

THANK YOU

Mr. Bar,

Please execute affidavits and
return as soon as possible
Thanks
Andrew

21357003

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Mary A. Dendinger, et al.,	)	Case No. C87-7117
	)	
Plaintiffs,	)	[Hon. Nicholas J. Walinski]
	)	
vs.	)	
	)	
Chrysler Plastic Products	)	DEFENDANT BFGOODRICH CO.
Corporation, et al.,	)	RESPONSES TO PLAINTIFFS'
	)	<u>INTERROGATORIES 101-106</u>
	)	
Defendants.	)	[Louis E. Tosi (0019756)
	)	Robert A. Bunda (0019775)
	)	Peggy A. Whipple (0029589)
	)	One SeaGate
	)	17th Floor
	)	P.O. Box 2088
	)	Toledo, Ohio 43603
	)	Telephone: (419) 247-2500
	)	Attorneys for Defendants:
	)	The BFGoodrich Co., Firestone
	)	Tire & Rubber, Co., Conoco,
	)	Inc., Uniroyal, Inc., Maxus
	)	Energy Corp., Tenneco, Inc.,
	)	Union Carbide Corp., and
	)	Occidental Chemical Corp.]

For its response to plaintiffs' interrogatories,
Nos. 101-106, Defendant BFGoodrich Co., responds, to the best of
its knowledge, as follows:

INTERROGATORY NO. 101: During what years were you a
member of the Manufacturing Chemists Association?

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Answer: Upon information and belief, defendant BFGoodrich Co., has been a member of the Manufacturing Chemist Association\Chemical Manufacturers Association from May 27, 1942 to present.

Interrogatory No. 102: Were you or was any employee of yours a member of the Manufacturing Chemists Association's Occupational Health Committee or Vinyl Chloride Committee prior to 1975.

Answer: Upon information and belief, yes.

Interrogatory No. 103: If your answer to the preceding interrogatory is "yes", indicate the full name, job title at the time, present job title, present business address and present home address of each employee of yours who attended any meeting of the Occupational Health Committee or Vinyl Chloride Committee, prior to 1975.

Answer: To the extent such information is available to Defendant BFGoodrich Co., attendees at Occupational Health Committee meetings were R.H. Wilson and W.E. McCormick.

R.H. Wilson: Rex H. Wilson, now deceased. At this time BFGoodrich Co. has no further information on Rex H. Wilson.

W.E. McCormick: William E. McCormick, Manager Industrial Hygiene and Toxicology, Manager Environmental Control, retired, home address 419 Dorchester Road, Akron, Ohio 44320.

Interrogatory No. 104: Referring to your Answer, bearing a certification date of October 5, 1988, state:

(A) The full name and address of each necessary party you contend plaintiffs have failed to join;

Answer: At the time of answering, defendant acted to avoid waiver of this defense. At this time, investigations relative to the defense of this matter are in progress, and if such investigations reveal information responsive to this interrogatory, defendant will seasonably supplement. As a result of discovery defendant can state at this time that plaintiffs' decedent could have been exposed to substances besides polyvinyl chloride, some of which could be potentially

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harmful, and plaintiff has failed to join the manufacturers of these substances as defendants herein.

(B) The reason that you have not joined or sought to join each alleged necessary party;

Answer: At the time of answering, defendant acted to avoid waiver of this defense. At this time, investigations relative to the defense of this matter are in progress, and if such investigations reveal information responsive to this interrogatory, defendant will seasonably supplement. Defendant refers to its answer to interrogatory 104(A) and adds that plaintiff has the burden of bringing before the court any parties which could be responsible for plaintiffs' alleged injuries.

(C) The bases for your contention, in your ninth defense, that this court lacks jurisdiction over the person of some of these defendants;

Answer: At the time of answering, defendant acted to avoid waiver of this defense. At this time, investigations relative to the defense of this matter are in progress, and if such investigations reveal information responsive to this interrogatory, defendant will seasonably supplement. Defendant can state at this time that plaintiff has failed to effectively serve one or more defendants.

(D) Over which defendants do you claim this court lacks in personam jurisdiction?

Answer: At the time of answering, defendant acted to avoid waiver of this defense. At this time, investigations relative to the defense of this matter are in progress, and if such investigations reveal information responsive to this interrogatory, defendant will seasonably supplement.

(E) The bases for your tenth affirmative defense, which asserts that this court lacks jurisdiction over the subject matter of this action;

Answer: At the time of answering, defendant acted to avoid waiver of this defense. At this time, investigations relative to the defense of this matter are in progress, and if such investigations reveal information responsive to this interrogatory, defendant will seasonably supplement.

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(F) The bases of paragraph 22 of your Answer which denies that this action is properly brought pursuant to R.C. 2125.01 et seq.

Answer: At the time of answering, defendant acted to avoid waiver of this defense. At this time, investigations relative to the defense of this matter are in progress, and if such investigations reveal information responsive to this interrogatory, defendant will seasonably supplement.

Interrogatory No. 105: As to each person these answering defendants expect or intend to call as an expert witness in the trial of this matter:

(A) State his or her full name.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(B) State his or her home address.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(C) State his or her business address.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(D) State his or her business, occupation, or profession.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(E) State his or her title or profession and the name

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and address of the business entity with which such expert is connected in such business, occupation, or profession.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(F) State his or her educational background, giving the names of all educational institutions attended; the dates of attendance; and the degrees earned, with dates thereof.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(G) State his or her specialty, if any, within his or her business, occupational, or profession.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(H) State his or her experience within his or her field, giving the dates, names, and addresses of prior employment, if any; dates, names, and addresses of institutions associated with, if any; and any other experience, indicating dates and places.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(I) State the names of all professional associations or societies with which he or she is related or of which he or she is a member, stating his or her status with each and the inclusive dates of such status.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with

this court, February 4, 1988 and included as an attachment to these answers.

(J) State the title, name of publication, name of publisher, and date of publication of any published books, articles, papers, treatises, etc., authored by such expert.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(K) State whether he or she has ever been a witness in any other lawsuits; and, if so, give the name of the suit, the kind of suit involved, the name of the court, the approximate date of his or her testimony, and the names and addresses of the parties or attorneys for whom he or she gave evidence.

Answer: This defendant objects to plaintiffs' Interrogatory 105 (K) as being overly broad and beyond the scope of FRCP 26(b)4(B) and a matter which is more suited to deposition.

(L) State the subject matter on which he or she is expected to testify.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

(M) State the substance of the facts or opinions to which he or she is expected to testify at trial and a summary of the specific grounds for each opinion.

Answer: To answer this interrogatory plaintiff need only refer to "responses of various defendants to plaintiffs' interrogatories regarding expert witnesses" filed with this court, February 4, 1988 and included as an attachment to these answers.

Interrogatory No. 106: As to each person these answering defendants expect or intend to call as a witness at the trial of this matter, state:

(A) His or her full name.

Answer: This defendant objects to Interrogatory 106(A) as being overly broad and beyond the scope of FRCP 26(B)(1). Then, without waiving the above this defendant states that in the interest of efficiency and cooperation this defendant will comply with plaintiffs' interrogatory 106(A) and answer as completely as possible when plaintiffs comply with this courts order filed April 12, 1988 (attached to these responses) requiring plaintiffs to disclose the identification of their expert and lay witnesses and the production of all documents and video tapes plaintiff intends on submitting into evidence.

(B) His or her home address.

Answer: This defendant objects to Interrogatory 106(B) as being overly broad and beyond the scope of FRCP 26(b)1. Then, without waiving the above, this defendant states that in the interest of efficiency and cooperation this defendant will comply with plaintiffs' interrogatory 106(B) and answer as completely as possible when plaintiffs comply with this courts order filed April 12, 1988 (attached to these responses) requiring plaintiffs to disclose the identification of their expert and lay witnesses and the production of all documents and video tapes plaintiffs intends on submitting into evidence.

(C) His or her business address.

Answer: This defendant objects to Interrogatory 106(C) as being overly broad and beyond the scope of FRCP 26(b)1. Then, without waiving the above, this defendant states that in the interest of efficiency and cooperation this defendant will comply with plaintiffs' interrogatory 106(C) and answer as completely as possible when plaintiffs comply with this courts order filed April 12, 1988 (attached to these responses) requiring plaintiffs to disclose the identification of their expert and lay witnesses and the production of all documents and video tapes plaintiffs intends on submitting into evidence.

(D) His or her business, occupation, or profession.

Answer: This defendant objects to Interrogatory 106(D) as being overly broad and beyond the scope of FRCP 26(b)1. Then, without waiving the above, this defendant states that in the interest of efficiency and cooperation this defendant will comply with plaintiffs' interrogatory

21357010

106(D) and answer as completely as possible when plaintiffs comply with this courts order filed April 12, 1988 (attached to these responses) requiring plaintiffs to disclose the identification of their expert and lay witnesses and the production of all documents and video tapes plaintiffs intends on submitting into evidence.

(E) The subject matter of his or her testimony.

Answer: This defendant objects to Interrogatory 106(E) as being overly broad and beyond the scope of FRCP 26(b)1. Then, without waiving the above, this defendant states that in the interest of efficiency and cooperation this defendant will comply with plaintiffs' interrogatory 106(E) and answer as completely as possible when plaintiffs comply with this courts order filed April 12, 1988 (attached to these responses) requiring plaintiffs to disclose the identification of their expert and lay witnesses and the production of all documents and video tapes plaintiffs intends on submitting into evidence.

Of Counsel for

The B.F. Goodrich Co.,
Firestone Tire & Rubber
Co., Conoco, Inc., Uniroyal,
Inc., Maxus Energy Corp.,
Tenneco, Inc., Union Carbide
Corp., and Occidental Chemical
Corp.:

Louis E. Tosi
Robert A. Bunda
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Trial Counsel for The B.F.
Goodrich Co., Firestone
Tire & Rubber Co., Conoco,
Inc., Uniroyal, Inc., Maxus
Energy Corp., Tenneco, Inc.,
Union Carbide Corp., and
Occidental Chemical Corp.

CERTIFICATE OF SERVICE

I hereby certify that a copy of The BFGoodrich Co., Responses to Plaintiffs' Responses to Plaintiffs' Interrogatories 101-106 has been mailed by United States Mail, postage prepaid, to Kirk J. Delli Bovi, Esq., attorney for plaintiffs, at his office located at Murray & Murray Co., L.P.A., 300 Central Avenue, Sandusky, Ohio 44870, and to defense counsel as set forth in the attached Schedule of Service this _____ day of December, 1988.

An Attorney for Defendants
The B.F. Goodrich Co.,
Firestone Tire & Rubber Co.,
Conoco, Inc., Uniroyal,
Inc., Maxus Energy Corp.,
Tenneco, Inc., Union Carbide
Corp., and Occidental
Chemical Corp.

STATE OF OHIO)
) SS
CUYAHOGA COUNTY)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Mary A. Dendinger, et al.,	)	Case No. C87-7117
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
Chrysler Plastic Products	)	
Corporation, et al.,	)	
	)	
Defendants.	)	
	)	

I, _____, being duly sworn, state that I am
_____, of The B.F. Goodrich Company; that the
responses to plaintiffs' request for production of documents are
not based upon my personal knowledge but are based upon
information contained in regular business records and upon
information received from other employees; and that the responses
to plaintiffs' request for production of documents are true and
correct to the best of my knowledge and information.

The BFGoodrich Company
6100 Oak Tree Boulevard
Cleveland, OH 44131
(216) 447-6449

Subscribed and sworn to before me this _____ day of
_____, 1988.

Notary Public

21357013

STATE OF OHIO)
) SS
CUYAHOGA COUNTY)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Mary A. Dendinger, et al.,	)	Case No. C87-7117
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
Chrysler Plastic Products	)	
Corporation, et al.,	)	
	)	
Defendants.	)	

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foregoing Answers to Interrogatories are not based upon my
personal knowledge but are based upon information contained in
regular business records and upon information received from other
employees; and that the foregoing Answers to Interrogatories are
true and correct to the best of my knowledge and information.

The B.F. Goodrich Company
6100 Oak Tree Blvd.
Cleveland, Ohio 44131
(216) 447-6226

Subscribed and sworn to before me this _____ day of
_____, 1988.

Notary Public

21357014