

SWEENEY, SHEEHAN & SPENCER
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Attorney for Maremont Corporation

VERNELL LONDON, Executrix of	:	COURT OF COMMON PLEAS
the Estate of BIRK REED	:	OF PHILADELPHIA COUNTY
	:	
v.	:	MAY TERM, 1983
	:	
MAREMONT CORPORATION, et al	:	NO. 6849
	:	
	:	(Asbestos Case)
	:	

ANSWER OF DEFENDANT, MAREMONT CORPORATION
TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

Defendant, Maremont Corporation, by its counsel, Sweeney, Sheehan & Spencer, hereby responds to plaintiff's request for production of documents as follows:

PRELIMINARY STATEMENT

Maremont Corporation sold its brake lining division to Nuturn Corporation, a wholly owned subsidiary of Turner and Newall, Ltd On June 30, 1977. Prior to that time, Maremont's brake lining division, the only division utilizing asbetos fiber, operated out of one plant in Paulding, Ohio. Upon purchase of that division by Nuturn, which was only a purchase of assets and not liabilities, a new

plant was constructed in Smithville, Tennessee.

Very few of Maremont's brake lining division employees went to work for Nuturn. Consequently, many of the answers to discovery requests are based on information obtained from Nuturn individuals who first started to work for Maremont after 1969. In addition thereto, very little documentation remains from the Paulding, Ohio operation. All other material pertaining to the operation was destroyed by Nuturn when the move took place to Smithville, Tennessee.

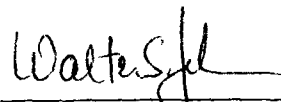
ANSWER TO REQUEST FOR PRODUCTION

1. Answering defendant does not have any invoices showing sales of any asbestos-containing brake linings, brake blocks, disc brake linings, or clutch facings to any of the companies delineated in the request for production of documents number 1. Maremont Corporation has possession only of the records of sales (country wide) of friction products from 1973. The 1973 records do not reveal any sale of any friction products to the United States Post Office, 30th Street Station in Philadelphia during that time period.

2. See preliminary statement. By way of further answer, the deposition of the Friction Material Standards Institute was taken by other counsel for other plaintiffs in 1982 or 1983. These documents, if they exist, can be obtained by counsel. By way of further answer, defendant objects to this request for production of documents on the basis that these documents are within the public realm and are equally accessible to plaintiff as they are to defendant.

SWEENEY, SHEEHAN & SPENCER

BY



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