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IN THE SUPERIOR COURT OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

JAMES FARRELL and LEOTA :
FARRELL, his wife, :
Plaintiffs, :
v. : Civil Action No. 77, 1973
: :
KEENE CORPORATION, et al :

DEFENDANTS' ATLAS ASBESTOS CORPORATION
AND BELL ASBESTOS MINES LTD.
ANSWERS TO PLAINTIFFS' FURTHER INTERROGATORIES

The following answers have been prepared and executed
by Atlas Asbestos Company Ltd., by and through its President,
Mr. George Barge.

Atlas Asbestos Company first shipped Limpet spray
asbestos to the United States in February 1967. Except where
otherwise indicated the following response to interrogatories
refers to shipments and/or production between that month and
December 31, 1971.

The following answers have been prepared by Mr. Barge
through use of his personal knowledge of the history of the
production of Limpet except where otherwise indicated. He is
the only person known to Defendants to have first hand know-
ledge and information of the facts contained herein.

1. For each year from January 1, 1963 until December 31, 1967, describe in detail the corporate and/or commercial relationship between Atlas Asbestos Corporation and/or Bell Asbestos Mines, Ltd., and J.W. Roberts Company.

(a) From October 1, 1963 until December 31, 1967, Atlas Asbestos Company was a division of Bell Asbestos Mines Ltd. Bell Asbestos Mines Ltd., is affiliated with J.W. Roberts Ltd., through common shareholders. From January 1, 1963 until September 30, 1963 Atlas Asbestos Company Limited was a corporation affiliated with J.W. Roberts Ltd., through common shareholders.

2. State for each year from January 1, 1963 until December 31, 1967, the approximate number of shipments and volume for each year of asbestos shipped by Atlas Asbestos Corporation and/or Bell Asbestos Mines, Ltd., to or on behalf of or at the order or direction of J.W. Roberts Company, and for such shipments state when they were made, to whom they were made, the source of the asbestos material contained therein, the geographical locations to which they were shipped, the terms and conditions under which they were shipped, the manner by which they were shipped, e.g. in bulk or in bags, and the extent, if any, to which Atlas Asbestos Corporation and/or Bell Asbestos Mines, Ltd. knew whether such shipments were used in part or in whole to manufacture a product sold as Limpet, and state in detail the facts pertaining thereto.

(a) Identify each individual who has knowledge of any of the information supplied in answer to this interrogatory.

(b) Identify each document which refers, reflects or relates to any information provided in answer to this interrogatory.

A. From January 1, 1963 until December 31, 1967, neither Atlas Asbestos Company nor Bell Asbestos Mines Ltd. shipped on behalf of or at the order or direction of J.W. Roberts, Ltd. any asbestos.

3. In 1966 and/or 1967 did Atlas Asbestos Corporation and/or Bell Asbestos Mines, Ltd. manufacture and/or sell a product known as Limpet. If so, please state the following:

(a) At whose initiation was said manufacturing of Limpet asbestos commenced.

(b) Were any contracts entered into between Atlas Asbestos Corporation and/or Bell Asbestos Mines Ltd., Armstrong Cork Company, Armstrong Contracting and Supply or J.W. Roberts Company of England.

(c) With regard to the contracts enumerated above, state the subject matter of each contract and where copies of these contracts can be obtained, names of all individuals having knowledge of these contracts, their addresses and the companies with which they are affiliated.

A. Yes.

(a) Defendant is unable to formulate a response to this interrogatory as it does not understand the use of the word "initiation" as it is used in this interrogatory.

(b) Yes.

(c) Assignment of licensing rights from J.W. Roberts Ltd., by Armstrong Contracting and Supply Corporation to Atlas Asbestos Company and license by J.W. Roberts Ltd., to Atlas Asbestos Company.

Copies of these agreements are not presently maintained by responding Defendant.

*True
by [signature]*

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4. With reference to any asbestos shipped to J.W. Roberts or manufactured or sold by Atlas Asbestos Corporation or Bell Asbestos Mines, Ltd., as Limpet during each year from January 1, 1963 until December 31, 1967, state:

(a) Whether the asbestos contained amosite asbestos and state the amount thereof in terms of the percentage of the total asbestos contained in the product.

(b) Identify the total amount of asbestos contained in the product, provide the exact formulation of the product including the other non-asbestos ingredients thereof; identify each individual who participated in the formulation of each such product and identify each document which refers, reflects or relates to any information provided in the answer to this interrogatory.

A.

(a) Most Limpet spray asbestos manufactured by Atlas Asbestos Company was made exclusively with amosite asbestos fibre. ?

(b) The total amount of asbestos contained in the product was 61%. The balance of the formulation was comprised of Portland cement with a small amount of oil. It is not now possible to identify any individual who participated in the formulation nor any document which supports the information provided herein.

5. With reference to any asbestos shipped to J.W. Roberts or manufactured or sold by Atlas Asbestos Corporation or Bell Asbestos Mines, Ltd. as Limpet during each year from January 1, 1963 until December 31, 1967, state:

(a) Whether the asbestos contained crocidolite asbestos and state the amount thereof in terms of the percentage of the total asbestos contained in the product.

(b) Identify the total amount of asbestos contained in the product; provide the exact formulation of the product including the other non-asbestos ingredients thereof; identify each individual who participated in the formulation of each such product and identify each document which refers, reflects or relates to any information provided in the answer to this interrogatory.

A.

(a) A limited amount of Limpet spray asbestos manufactured by Atlas Asbestos Company was made exclusively with crocidolite asbestos fibre.

(b) The total amount of crocidolite asbestos contained in the product was 61%. The balance of the formulation was comprised of Portland cement with a small amount of oil. It is not now possible to identify any individual who participated in the formulation nor any document which supports the information provided herein.

6. With reference to any asbestos shipped to J.W. Roberts or manufactured or sold by Atlas Asbestos Corporation or Bell Asbestos Mines, Ltd., as Limpet during each year from January 1, 1963 until December 31, 1967, state:

(a) Whether the asbestos contained chrysotile asbestos and state the amount thereof in terms of the percentage of the total asbestos contained in the product.

(b) Identify the total amount of asbestos contained in the product, provide the exact formulation

of the product including the other non-asbestos ingredients thereof; identify each individual who participated in the formulation of each such product and identify each document which refers, reflects or relates to any information provide in the answer to this interrogatory.

A.

(a) A very limited amount of Limpet spray asbestos manufactured by Atlas Asbestos Company was made with chrysotile asbestos fibre combined with amosite asbestos fibre.

(b) The ration of chrysotile to amosite is not available. The total fibre content was approximately 61% with a small amount of chrysotile and the balance composed of amosite. The balance of this formulation was Portland cement with a small amount of oil and some titanium dioxide. It is not now possible to identify any individual who participated in the formulation or any documents supporting this information.

7. With regard to the amosite asbestos identified in the answer to interrogatory No. 4, state when it was purchased, from whom it was purchased, describe the manner in which it was received, stored and used in the production of the product and describe the geographical location that the production of the product took place. Identify each individual who has any information in response to this interrogatory. Identify each document that refers, reflects or relates to any information provided in answer to this interrogatory.

A. Amosite asbestos fibre was purchased from Turner's Asbestos Fibres, Ltd., Manchester, England. It was received in jute or plastic bags weighing approximately 100 pounds and stored on pallets in the warehouse of the Atlas Asbestos Company plant on Hochelaga Street, Montreal, Quebec, Canada where

production of Limpet spray also took place. It is not now possible to identify individuals or documents to support this information.

8. With regard to the crocidolite asbestos identified in the answer to interrogatory No. 5, state when it was purchased, from whom it was purchased, describe the manner in which it was received, stored and used in the production of the product and describe the geographical location that the production of the product took place. Identify each individual who has any information in response to this interrogatory. Identify each document that refers, reflects or relates to any information provided in answer to this interrogatory.

A. Crocidolite asbestos fibre was purchased from EGNEP Pty. Ltd., Johannesburg, South Africa. It was received in jute or plastic bags weighing approximately 100 pounds and stored on pallets in the warehouse on the Atlas Asbestos Company plant on Hochelaga Street, Montreal, Quebec, Canada where production of Limpet spray also took place. It is not now possible to identify individuals or documents to support this information.

9. With regard to the chrysotile asbestos identified in the answer to interrogatory No. 6, state when it was purchased, from whom it was purchased, describe the manner in which it was received, stored and used in the production of the product and describe the geographical location that the production of the product took place. Identify each individual who has any information which refers to this interrogatory. Identify each document that refers, reflects or relates to any information provided in answer to this interrogatory.

A. Chrysotile asbestos fibre was purchased from Bell Asbestos Mines, Ltd., Thetford Mines, Quebec, Canada. It was received in plastic bags weighing approximately 100 pounds and stored on pallets in the warehouse of the Atlas Asbestos Company

plant on Hochelaga Street, Montreal, Quebec, Canada, where production of Limpet spray also took place. It is not now possible to identify individuals or documents to support this information.

DISTRICT OF MONTREAL:

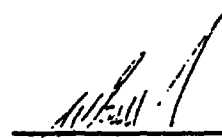
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PROVINCE OF QUEBEC

BE IT REMEMBERED that on this 2nd day of March, A.D., 1978, personally appeared before me, Commissioner of Oaths for the District of Montreal, the Subscriber, George Barge, President of Atlas Asbestos Company Ltd., who being duly sworn according to law, did depose and say that the answers to the Interrogatories attached hereto are true and correct to the best of his knowledge and belief.



SWORN TO AND SUBSCRIBED before me the day
and year aforesaid.



YVONNE GALLANT
Commissioner of Oaths, SS, Q.C.
District of Montreal