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PLAINTIFF'S EXHIBIT

K-1975

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FIBREBOARD CORPORATION, PITTSBURGH-CORNING
CORPORATION, OWENS-ILLINOIS, INC.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ALAMEDA

WILLIE COLEMAN, et al.,	)	No. 650495-3
	)	
Plaintiffs,	)	
	)	
v.	)	DEFENDANT, OWENS-
	)	ILLINOIS, INC.'S ANSWERS
FIBREBOARD CORP., et al,	)	TO PLAINTIFF'S FIRST SET
	)	OF INTERROGATORIES
Defendants.	)	
	)	

PROPOUNDING PARTY: Plaintiffs, WILLIE COLEMAN, et al.,

RESPONDING PARTY: Defendant, OWENS-ILLINOIS, INC.

SET NUMBER: One (1)

REFERENCE: WILLIE COLEMAN v. OWENS-ILLINOIS, INC., et al.

OWENS-ILLINOIS, INC. by and through its counsel of record hereby responds in writing under oath to plaintiff's interrogatories.

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

This defendant objects on the basis that it has previously responded to 58 interrogatories propounded in In

1 Re: Complex Asbestos Litigation and In Re: Shipyard and
2 Applicator Asbestos Cases (Consolidated for discovery) Nos.
3 607734-9 and 537868 for this case. Many of these
4 interrogatories are similar, repetitious, burdensom and
5 harassing in light of the earlier responses.

6 Some of the events which may be relevant to the
7 matters inquired about by Plaintiffs' Interrogatories
8 apparently occurred more than thirty-five years ago. In
9 addition, effective April 30, 1958, Owens-Illinois, Inc.
10 disposed of the business involved in this action by way of sale
11 of that business to Owens-Corning Fiberglas Corporation. Since
12 that time, Owens-Illinois, Inc. has not engaged in any such
13 business. It does not now and it has not since that sale
14 manufactured, distributed or sold any asbestos-containing
15 products. As a result of the foregoing factors, many of the
16 individuals who might have had personal knowledge of the
17 matters to which plaintiffs' interrogatories relate are
18 deceased, or are otherwise unavailable to Owens-Illinois, Inc.,
19 and investigations to date indicate that at least some
20 documents which relate to matters inquired about by these
21 interrogatories may have been transferred to Owens-Corning
22 Fiberglas Corporation with the transfer of the business in
23 question in 1958. Owens-Illinois, Inc. is engaged in a
24 continuing investigation in an attempt to locate, confirm the
25 transfer of, or confirm the absence of, such documents and is
26 also engaged in a continuing investigation into the matters
27 inquired about in these interrogatories. Unless otherwise
28 stated in an answer to a specific interrogatory, the answers

1 set out hereinafter are limited to the period during which
2 Owens-Illinois, Inc. manufactured asbestos-containing
3 insulation products and to the facilities related to that
4 business. The following is part of and is incorporated by
5 reference in every answer provided hereinafter:

6 This answer is accurate as of the date made.
7 However, Owens-Illinois, Inc.'s investigation is
8 continuing, and Owens-Illinois, Inc. cannot exclude
9 the possibility that it may be able to obtain more
10 complete information or even information which
11 indicates that the answer being supplied is
12 incorrect. Owens-Illinois, Inc. objects to answering
13 this interrogatory in regard to any period of time
14 other than the period during which it engaged in the
15 business involved in this case which ended in
16 mid-1958 or concerning any facility not related to
17 that business, on the basis that any such answer
18 would be irrelevant to the subject matter of the
19 pending litigation, would not be reasonably
20 calculated to lead to the discovery of admissible
21 evidence, and would be burdensome and oppressive.

22 Furthermore, Owens-Illinois, Inc. objects to the
23 instructions and definitions supplied by plaintiffs with regard
24 to these interrogatories, on the basis that the definitions are
25 overbroad, vague, and often inconsistent with the normal usage
26 and meaning of such words, and the instructions are overbroad,
27 burdensome and constitute an unreasonable expansion of the
28

interrogatories themselves. Owens-Illinois, Inc. therefore gives notice that it does not consider itself bound by the instructions and definitions propounded by plaintiffs, and instead shall answer the interrogatories in a manner consistent with a normal understanding of the language used in the interrogatory and to the extent necessary to fairly and fully answer the interrogatory. Owens-Illinois construes these interrogatories not to call for information protected by the attorney-client privilege, work product doctrine or any other privilege. Since applicable law only requires discovery regarding any matter not privileged, Owens-Illinois is not required by that rule to specify privileged material where to do so would reveal its attorney's work product. Owens-Illinois objects to any request for a specification of privileged materials absent a proper showing of necessity.

RESPONSE TO INTERROGATORY NO. 1:

Defendant objects to Interrogatory No. 1 on the basis that it is overly broad, vague and ambiguous. The interrogatory also calls for information that defendant has no reasonable access to and requests information which is not within the personal knowledge or possession or control of Owens-Illinois, its employees or agents and is therefore not reasonably calculated to lead to the discovery of admissible evidence and is burdensome and oppressive. Owens-Illinois objects to any interrogatory in regard to any time other than which it engaged in business involved in this case on the basis such information is irrelevant and is not calculated to lead to the discovery of admissible evidence and as such is burdensome and oppressive.

1 RESPONSE TO INTERROGATORY NO. 2:

2 Owens-Illinois objects to this interrogatory on the
3 grounds that it seeks identification of all persons'
4 knowledgeable of a possible particular fact, and as such is
5 overly broad, unduly burdensome, oppressive and harassing.
6 This interrogatory is overly broad in calling for
7 identification of each person with knowledge of the subject;
8 many of the persons who possibly may be knowledgeable are now
9 deceased or cannot be located. Moreover, due to the extensive
10 passage of time that has occurred since the date covered by
11 this interrogatory, those who may have had knowledge of this
12 subject may not be able to recall such knowledge nor the time
13 during which it was acquired. It also calls for information
14 that Owens-Illinois has no reasonable access to and requests
15 information which is not in the control of Owens-Illinois, its
16 employees or agents, and as such is not reasonably calculated
17 to lead to the discovery of admissible evidence.
18 Owens-Illinois objects to any interrogatory in regard to any
19 time other than which it engaged in business involved in this
20 case on the basis any such information is irrelevant, not
21 reasonably calculated to lead to the discovery of admissible
22 evidence and is burdensome and oppressive.

23 RESPONSE TO INTERROGATORY NO. 3:

24 Defendant objects to Interrogatory No. 3 on the basis
25 that it is overly broad, vague and ambiguous. The
26 interrogatory also calls for information that defendant has no
27 reasonable access to and requests information which is not
28 within the personal knowledge or possession or control of

1 Owens-Illinois, its employees or agents and is therefore not
2 reasonably calculated to lead to the discovery of admissible
3 evidence and is burdensome and oppressive.

4 This interrogatory, in addition, covers a period of
5 time before Owens-Illinois engaged in business involved in this
6 case and therefore is not calculated to lead to the discovery
7 of admissible evidence.

8 RESPONSE TO INTERROGATORY NO. 4:

9 Owens-Illinois objects to answering this
10 interrogatory on the basis it is overbroad, vague, irrelevant
11 and not calculated to lead to the discovery of any admissible
12 evidence. Owens-Illinois objects to any interrogatory in
13 regard to any time other than which it engaged in business
14 involved in this case on the basis such information is
15 irrelevant and is not calculated to lead to the discovery of
16 admissible evidence and as such is burdensom and oppressive.

17 RESPONSE TO INTERROGATORY NO. 5:

18 Defendant objects to Interrogatory No. 5 on the basis
19 that it is overly broad, vague and ambiguous. The
20 interrogatory also calls for information that defendant has no
21 reasonable access to and requests information which is not
22 within the personal knowledge or possession or control of
23 Owens-Illinois, its employees or agents and is therefore not
24 reasonably calculated to lead to the discovery of admissible
25 evidence and is burdensome and oppressive.

26 RESPONSE TO INTERROGATORY NO. 6:

27 Owens-Illinois objects to this interrogatory on the
28 grounds that it seeks identification of all persons'

1 knowledgeable of a possible particular fact, and as such is
2 overly broad, unduly burdensome, oppressive and harassing.
3 This interrogatory is overly broad in calling for
4 identification of each person with knowledge of the subject;
5 many of the persons who possibly may be knowledgeable are now
6 deceased or cannot be located. Moreover, due to the extensive
7 passage of time that has occurred since the date covered by
8 this interrogatory, those who may have had knowledge of this
9 subject may not be able to recall such knowledge nor the time
10 during which it was acquired. It also calls for information
11 that Owens-Illinois has no reasonable access to and requests
12 information which is not in the control of Owens-Illinois, its
13 employees or agents, and as such is not reasonably calculated
14 to lead to the discovery of admissible evidence.

15 Owens-Illinois objects to any interrogatory in regard to any
16 time other than which it engaged in business involved in this
17 case on the basis such information is irrelevant and is not
18 calculated to lead to the discovery of admissible evidence and
19 as such is burdensom and oppressive.

20 RESPONSE TO INTERROGATORY NO. 7:

21 Defendant objects to Interrogatory No. 7 on the basis
22 that it is overly broad, vague and ambiguous. The
23 interrogatory also calls for information that defendant has no
24 reasonable access to and requests information which is not
25 within the personal knowledge or possession or control of
26 Owens-Illinois, its employees or agents and is therefore not
27 reasonably calculated to lead to the discovery of admissible
28 evidence and is burdensome and oppressive.

1 RESPONSE TO INTERROGATORY NO. 8:

2 Owens-Illinois objects to answering this
3 interrogatory on the basis it is overbroad, vague, irrelevant
4 and not calculated to lead to the discovery of any admissible
5 evidence. Owens-Illinois objects to any interrogatory in
6 regard to any time other than which it engaged in business
7 involved in this case on the basis such information is
8 irrelevant and is not calculated to lead to the discovery of
9 admissible evidence and as such is burdensom and oppressive.

10 RESPONSE TO INTERROGATORY NO. 9:

11 Defendant objects to Interrogatory No. 9 on the basis
12 that it is overly broad, vague and ambiguous. The
13 interrogatory also calls for information that defendant has no
14 reasonable access to and requests information which is not
15 within the personal knowledge or possession or control of
16 Owens-Illinois, its employees or agents and is therefore not
17 reasonably calculated to lead to the discovery of admissible
18 evidence and is burdensome and oppressive. Owens-Illinois
19 objects to any interrogatory in regard to any time other than
20 which it engaged in business involved in this case on the basis
21 such information is irrelevant and is not calculated to lead to
22 the discovery of admissible evidence and as such is burdensom
23 and oppressive.

24 RESPONSE TO INTERROGATORY NO. 10:

25 Owens-Illinois objects to answering this
26 -interrogatory on the basis it is overbroad, vague, irrelevant
27 and not calculated to lead to the discovery of any admissible
28 evidence. Owens-Illinois objects to any interrogatory in

1 regard to any time other than which it engaged in business
2 involved in this case on the basis such information is
3 irrelevant and is not calculated to lead to the discovery of
4 admissible evidence and as such is burdensom and oppressive.

5 RESPONSE TO INTERROGATORY NO. 11:

6 Defendant objects to Interrogatory No. 11 on the
7 basis that it is overly broad, vague and ambiguous. The
8 interrogatory also calls for information that defendant has no
9 reasonable access to and requests information which is not
10 within the personal knowledge or possession or control of
11 Owens-Illinois, its employees or agents and is therefore not
12 reasonably calculated to lead to the discovery of admissible
13 evidence and is burdensome and oppressive. Owens-Illinois
14 objects to any interrogatory in regard to any time other than
15 which it engaged in business involved in this case on the basis
16 such information is irrelevant and is not calculated to lead to
17 the discovery of admissible evidence and as such is burdensom
18 and oppressive.

19 RESPONSE TO INTERROGATORY NO. 12:

20 Owens-Illinois objects to this interrogatory on the
21 grounds that it seeks identification of all persons'
22 knowledgeable of a possible particular fact, and as such is
23 overly broad, unduly burdensome, oppressive and harassing.
24 This interrogatory is overly broad in calling for
25 identification of each person with knowledge of the subject;
26 many of the persons who possibly may be knowledgeable are now
27 deceased or cannot be located. Moreover, due to the extensive
28 passage of time that has occurred since the date covered by

1 this interrogatory, those who may have had knowledge of this
2 subject may not be able to recall such knowledge nor the time
3 during which it was acquired. It also calls for information
4 that Owens-Illinois has no reasonable access to and requests
5 information which is not in the control of Owens-Illinois, its
6 employees or agents, and as such is not reasonably calculated
7 to lead to the discovery of admissible evidence.

8 Owens-Illinois objects to any interrogatory in regard to any
9 time other than which it engaged in business involved in this
10 case on the basis such information is irrelevant and is not
11 calculated to lead to the discovery of admissible evidence and
12 as such is burdensom and oppressive.

13 RESPONSE TO INTERROGATORY NO. 13:

14 Defendant objects to Interrogatory No. 13 on the
15 basis that it is overly broad, vague and ambiguous. The
16 interrogatory also calls for information that defendant has no
17 reasonable access to and requests information which is not
18 within the personal knowledge or possession or control of
19 Owens-Illinois, its employees or agents and is therefore not
20 reasonably calculated to lead to the discovery of admissible
21 evidence and is burdensome and oppressive.

22 RESPONSE TO INTERROGATORY NO. 14:

23 Owens-Illinois objects to this interrogatory on the
24 grounds that it seeks identification of all persons'
25 knowledgeable of a possible particular fact, and as such is
26 overly broad, unduly burdensome, oppressive and harassing.
27 This interrogatory is overly broad in calling for
28 identification of each person with knowledge of the subject;

1 many of the persons who possibly may be knowledgeable are now
2 deceased or cannot be located. Moreover, due to the extensive
3 passage of time that has occurred since the date covered by
4 this interrogatory, those who may have had knowledge of this
5 subject may not be able to recall such knowledge nor the time
6 during which it was acquired. It also calls for information
7 that Owens-Illinois has no reasonable access to and requests
8 information which is not in the control of Owens-Illinois, its
9 employees or agents, and as such is not reasonably calculated
10 to lead to the discovery of admissible evidence.

11 Owens-Illinois objects to any interrogatory in regard to any
12 time other than which it engaged in business involved in this
13 case on the basis such information is irrelevant and is not
14 calculated to lead to the discovery of admissible evidence and
15 as such is burdensom and oppressive.

16 RESPONSE TO INTERROGATORY NO. 15:

17 Defendant objects to Interrogatory No. 15 on the
18 basis that it is overly broad, vague and ambiguous. The
19 interrogatory also calls for information that defendant has no
20 reasonable access to and requests information which is not
21 within the personal knowledge or possession or control of
22 Owens-Illinois, its employees or agents and is therefore not
23 reasonably calculated to lead to the discovery of admissible
24 evidence and is burdensome and oppressive. Owens-Illinois
25 objects to any interrogatory in regard to any time other than
26 - which it engaged in business involved in this case on the basis
27 such information is irrelevant and is not calculated to lead to
28 the discovery of admissible evidence and as such is burdensom
and oppressive.

1 RESPONSE TO INTERROGATORY NO. 16:

2 Owens-Illinois objects to this interrogatory on the
3 grounds that it seeks identification of all persons'
4 knowledgeable of a possible particular fact, and as such is
5 overly broad, unduly burdensome, oppressive and harassing.
6 This interrogatory is overly broad in calling for
7 identification of each person with knowledge of the subject;
8 many of the persons who possibly may be knowledgeable are now
9 deceased or cannot be located. Moreover, due to the extensive
10 passage of time that has occurred since the date covered by
11 this interrogatory, those who may have had knowledge of this
12 subject may not be able to recall such knowledge nor the time
13 during which it was acquired. It also calls for information
14 that Owens-Illinois has no reasonable access to and requests
15 information which is not in the control of Owens-Illinois, its
16 employees or agents, and as such is not reasonably calculated
17 to lead to the discovery of admissible evidence.

18 Owens-Illinois objects to any interrogatory in regard to any
19 time other than which it engaged in the relevant business on
20 the basis any such answer is irrelevant, not reasonably
21 calculated to lead to the discovery of admissible evidence and
22 is burdensome and oppressive.

23 RESPONSE TO INTERROGATORY NO. 17:

24 Defendant objects to Interrogatory No. 17 on the
25 basis that it is overly broad, vague and ambiguous. The
26 interrogatory also calls for information that defendant has no
27 reasonable access to and requests information which is not
28 within the personal knowledge or possession or control of

1 Owens-Illinois, its employees or agents and is therefore not
2 reasonably calculated to lead to the discovery of admissible
3 evidence and is burdensome and oppressive. Owens-Illinois
4 objects to any interrogatory in regard to any time other than
5 which it engaged in business involved in this case on the basis
6 such information is irrelevant and is not calculated to lead to
7 the discovery of admissible evidence and as such is burdensom
8 and oppressive.

9 RESPONSE TO INTERROGATORY NO. 18:

10 Owens-Illinois objects to answering this
11 interrogatory on the basis it is overbroad, vague, irrelevant
12 and not calculated to lead to the discovery of any admissible
13 evidence. Owens-Illinois objects to any interrogatory in
14 regard to any time other than which it engaged in business
15 involved in this case on the basis such information is
16 irrelevant and is not calculated to lead to the discovery of
17 admissible evidence and as such is burdensom and oppressive.

18 RESPONSE TO INTERROGATORY NO. 19:

19 Owens-Illinois objects to answering this
20 interrogatory on the basis it is overbroad, vague, irrelevant
21 and not calculated to lead to the discovery of any admissible
22 evidence. Owens-Illinois objects to any interrogatory in
23 regard to any time other than which it engaged in business
24 involved in this case on the basis such information is
25 irrelevant and is not calculated to lead to the discovery of
26 admissible evidence and as such is burdensom and oppressive.

27 RESPONSE TO INTERROGATORY NO. 20:

28 Owens-Illinois objects to answering this

1 interrogatory on the basis it is overbroad, vague, irrelevant
2 and not calculated to lead to the discovery of any admissible
3 evidence. Owens-Illinois objects to any interrogatory in
4 regard to any time other than which it engaged in business
5 involved in this case on the basis such information is
6 irrelevant and is not calculated to lead to the discovery of
7 admissible evidence and as such is burdensom and oppressive.

8 RESPONSE TO INTERROGATORY NO. 21:

9 Defendant objects to Interrogatory No. 21 on the
10 basis that it is overly broad, vague and ambiguous. The
11 interrogatory also calls for information that defendant has no
12 reasonable access to and requests information which is not
13 within the personal knowledge or possession or control of
14 Owens-Illinois, its employees or agents and is therefore not
15 reasonably calculated to lead to the discovery of admissible
16 evidence and is burdensome and oppressive. Owens-Illinois
17 objects to any interrogatory in regard to any time other than
18 which it engaged in business involved in this case on the basis
19 such information is irrelevant and is not calculated to lead to
20 the discovery of admissible evidence and as such is burdensom
21 and oppressive.

22 RESPONSE TO INTERROGATORY NO. 22:

23 Owens-Illinois objects to answering this
24 interrogatory on the basis it is overbroad, vague, irrelevant
25 and not calculated to lead to the discovery of any admissible
26 evidence. Owens-Illinois objects to any interrogatory in
27 regard to any time other than which it engaged in business
28 involved in this case on the basis such information is

1 irrelevant and is not calculated to lead to the discovery of
2 admissible evidence and as such is burdensom and oppressive.

3 RESPONSE TO INTERROGATORY NO. 23:

4 Owens-Illinois objects to answering this
5 interrogatory on the basis it is overbroad, vague, irrelevant
6 and not calculated to lead to the discovery of any admissible
7 evidence and is also burdensome and oppressive. Owens-Illinois
8 objects to any interrogatory in regard to any time other than
9 which it engaged in business involved in this case on the basis
10 such information is irrelevant and is not calculated to lead to
11 the discovery of admissible evidence and as such is burdensom
12 and oppressive.

13 RESPONSE TO INTERROGATORY NO. 24:

14 Owens-Illinois objects to answering this
15 interrogatory on the basis it is overbroad, vague, irrelevant
16 and not calculated to lead to the discovery of any admissible
17 evidence. Owens-Illinois objects to any interrogatory in
18 regard to any time other than which it engaged in business
19 involved in this case on the basis such information is
20 irrelevant and is not calculated to lead to the discovery of
21 admissible evidence and as such is burdensom and oppressive.

22 RESPONSE TO INTERROGATORY NO. 25:

23 Defendant objects to Interrogatory No. 25 on the
24 basis that it is overly broad, vague and ambiguous. The
25 interrogatory also calls for information that defendant has no
26 reasonable access to and requests information which is not
27 within the personal knowledge or possession or control of
28 Owens-Illinois, its employees or agents and is therefore not

1 reasonably calculated to lead to the discovery of admissible
2 evidence and is burdensome and oppressive.

3 Owens-Illinois objects to any interrogatory in regard
4 to any time other than which it engaged in business involved in
5 this case on the basis such information is irrelevant and is
6 not calculated to lead to the discovery of admissible evidence
7 and as such is burdensom and oppressive.

8 RESPONSE TO INTERROGATORY NO. 26:

9 Owens-Illinois objects to answering this
10 interrogatory on the basis it is overbroad, vague, irrelevant
11 and not calculated to lead to the discovery of any admissible
12 evidence. Owens-Illinois objects to any interrogatory in
13 regard to any time other than which it engaged in business
14 involved in this case on the basis such information is
15 irrelevant and is not calculated to lead to the discovery of
16 admissible evidence and as such is burdensom and oppressive.

17 RESPONSE TO INTERROGATORY NO. 27:

18 Defendant objects to Interrogatory No. 27. on the
19 basis that it is overly broad, vague and ambiguous. The
20 interrogatory also calls for information that defendant has no
21 reasonable access to and requests information which is not
22 within the personal knowledge or possession or control of
23 Owens-Illinois, its employees or agents and is therefore not
24 reasonably calculated to lead to the discovery of admissible
25 evidence and is burdensome and oppressive.

26 Owens-Illinois objects to any interrogatory in regard
27 to any time other than which it engaged in business involved in
28 this case on the basis such information is irrelevant and is

1 not calculated to lead to the discovery of admissible evidence
2 and as such is burdensom and oppressive.

3 RESPONSE TO INTERROGATORY NO. 28:

4 Defendant objects to Interrogatory No. 28 on the
5 basis that it is overly broad, vague and ambiguous. The
6 interrogatory also calls for information that defendant has no
7 reasonable access to and requests information which is not
8 within the personal knowledge or possession or control of
9 Owens-Illinois, its employees or agents and is therefore not
10 reasonably calculated to lead to the discovery of admissible
11 evidence and is burdensome and oppressive.

12 Owens-Illinois objects to any interrogatory in regard
13 to any time other than which it engaged in business involved in
14 this case on the basis such information is irrelevant and is
15 not calculated to lead to the discovery of admissible evidence
16 and as such is burdensom and oppressive.

17 RESPONSE TO INTERROGATORY NO. 29:

18 Defendant objects to Interrogatory No. 29 on the
19 basis that it is overly broad, vague and ambiguous. The
20 interrogatory also calls for information that defendant has no
21 reasonable access to and requests information which is not
22 within the personal knowledge or possession or control of
23 Owens-Illinois, its employees or agents and is therefore not
24 reasonably calculated to lead to the discovery of admissible
25 evidence and is burdensome and oppressive.

26 Owens-Illinois objects to any interrogatory in regard
27 to any time other than which it engaged in business involved in
28 this case on the basis such information is irrelevant and is

1 not calculated to lead to the discovery of admissible evidence
2 and as such is burdensom and oppressive.

3 RESPONSE TO INTERROGATORY NO. 30:

4 Only a small portion of Owens-Illinois' business or
5 corporate history relates to the subject matter of this
6 litigation which is alleged exposure to asbestos-containing
7 insulation products. Owens-Illinois objects to this
8 interrogatory on the basis that it is vague, overly broad,
9 irrelevant, immaterial and not reasonably calculated to lead to
10 the discovery of admissible evidence. In addition it is
11 burdensome and harassing.

12 RESPONSE TO INTERROGATORY NO. 31:

13 Owens-Illinois objects to this interrogatory on the
14 basis that it is vague, overly broad, irrelevant, immaterial
15 and not reasonably calculated to lead to the discovery of
16 admissible evidence. It is also burdensome, oppressive and
17 harassing. Owens-Illinois objects to any interrogatory in
18 regard to any time other than which it engaged in business
19 involved in this case on the basis such information is
20 irrelevant and is not calculated to lead to the discovery of
21 admissible evidence and as such is burdensom and oppressive.

22 RESPONSE TO INTERROGATORY NO. 32:

23 Owens-Illinois objects to this interrogatory on the
24 basis that it is vague, overly broad, irrelevant, immaterial
25 and not reasonably calculated to lead to the discovery of
26 admissible evidence. It is also burdensome and oppressive.

27 RESPONSE TO INTERROGATORY NO. 33:

28 Only a small portion of Owens-Illinois' business or

1 corporate history relates to the subject matter of this
2 litigation, alleged exposure to asbestos-containing insulation
3 products. Owens-Illinois objects to this interrogatory on the
4 basis that it is vague, overly broad, irrelevant, immaterial
5 and not reasonably calculated to lead to the discovery of
6 admissible evidence. Also, please see response to
7 Interrogatory No. 32.

8 RESPONSE TO INTERROGATORY NO. 34:

9 Owens-Illinois objects to this interrogatory on the
10 grounds that it seeks identification of all persons'
11 knowledgeable of a possible particular fact, and as such is
12 overly broad, unduly burdensome, oppressive and harassing.
13 This interrogatory is overly broad in calling for
14 identification of each person with knowledge of the subject;
15 many of the persons who possibly may be knowledgeable are now
16 deceased or cannot be located. Moreover, due to the extensive
17 passage of time that has occurred since the date covered by
18 this interrogatory, those who may have had knowledge of this
19 subject may not be able to recall such knowledge nor the time
20 during which it was acquired. It also calls for information
21 that Owens-Illinois has no reasonable access to and requests
22 information which is not in the control of Owens-Illinois, its
23 employees or agents, and as such is not reasonably calculated
24 to lead to the discovery of admissible evidence.

25 Owens-Illinois objects to any interrogatory in regard to any
26 time other than which it engaged in business involved in this
27 case on the basis such information is irrelevant and is not
28 calculated to lead to the discovery of admissible evidence and
as such is burdensom and oppressive.

1 RESPONSE TO INTERROGATORY NO. 35:

2 Only a small portion of Owens-Illinois' business or
3 corporate history relates to the subject matter of this
4 litigation, alleged exposure to asbestos-containing insulation
5 products. Owens-Illinois objects to this interrogatory on the
6 basis that it is vague, overly broad, irrelevant, immaterial
7 and not reasonably calculated to lead to the discovery of
8 admissible evidence. It is, in addition, burdensome,
9 oppressive and harassing.

10 RESPONSE TO INTERROGATORY NO. 36:

11 Not applicable.

12 Please see response to Interrogatory No. 35.

13 RESPONSE TO INTERROGATORY NO. 37:

14 Owens-Illinois objects to this interrogatory on the
15 basis that it is vague, overly broad, irrelevant, immaterial
16 and not reasonably calculated to lead to the discovery of
17 admissible evidence. It is burdensome, oppressive and
18 harassing. Owens-Illinois objects to any interrogatory in
19 regard to any time other than which it engaged in business
20 involved in this case on the basis such information is
21 irrelevant and is not calculated to lead to the discovery of
22 admissible evidence and as such is burdensom and oppressive.

23 RESPONSE TO INTERROGATORY NO. 38:

24 Owens-Illinois objects to this interrogatory on the
25 basis that it is vague, overly broad, irrelevant, immaterial
26 and not reasonably calculated to lead to the discovery of
27 admissible evidence. Owens-Illinois objects to any
28 interrogatory in regard to any time other than which it engaged

1 in business involved in this case on the basis such information
2 is irrelevant and is not calculated to lead to the discovery of
3 admissible evidence and as such is burdensom and oppressive.

4 RESPONSE TO INTERROGATORY NO. 39:

5 Owens-Illinois objects to answering this
6 interrogatory on the basis it is overbroad, vague, irrelevant
7 and not calculated to lead to the discovery of any admissible
8 evidence. Owens-Illinois objects to any interrogatory in
9 regard to any time other than which it engaged in business
10 involved in this case on the basis such information is
11 irrelevant and is not calculated to lead to the discovery of
12 admissible evidence and as such is burdensom and oppressive.

13 RESPONSE TO INTERROGATORY NO. 40:

14 Owens-Illinois objects to this interrogatory on the
15 grounds that it seeks identification of all persons'
16 knowledgeable of a possible particular fact, and as such is
17 overly broad, unduly burdensome, oppressive and harassing.
18 This interrogatory is overly broad in calling for
19 identification of each person with knowledge of the subject;
20 many of the persons who possibly may be knowledgeable are now
21 deceased or cannot be located. Moreover, due to the extensive
22 passage of time that has occurred since the date covered by
23 this interrogatory, those who may have had knowledge of this
24 subject may not be able to recall such knowledge nor the time
25 during which it was acquired. It also calls for information
26 that Owens-Illinois has no reasonable access to and requests
27 information which is not in the control of Owens-Illinois, its
28 employees or agents, and as such is not reasonably calculated

1 to lead to the discovery of admissible evidence.

2 Owens-Illinois objects to any interrogatory in regard to any
3 time other than which it engaged in business involved in this
4 case on the basis such information is irrelevant and is not
5 calculated to lead to the discovery of admissible evidence and
6 as such is burdensom and oppressive.

7 RESPONSE TO INTERROGATORY NO. 41:

8 Owens-Illinois objects to this interrogatory on the
9 grounds that it seeks identification of all persons'
10 knowledgeable of a possible particular fact, and as such is
11 overly broad, unduly burdensome, oppressive and harassing.
12 This interrogatory is overly broad in calling for
13 identification of each person with knowledge of the subject;
14 many of the persons who possibly may be knowledgeable are now
15 deceased or cannot be located. Moreover, due to the extensive
16 passage of time that has occurred since the date covered by
17 this interrogatory, those who may have had knowledge of this
18 subject may not be able to recall such knowledge nor the time
19 during which it was acquired. It also calls for information
20 that Owens-Illinois has no reasonable access to and requests
21 information which is not in the control of Owens-Illinois, its
22 employees or agents, and as such is not reasonably calculated
23 to lead to the discovery of admissible evidence.

24 Owens-Illinois objects to any interrogatory in regard to any
25 time other than which it engaged in business involved in this
26 case on the basis such information is irrelevant and is not
27 calculated to lead to the discovery of admissible evidence and
28 as such is burdensom and oppressive.

1 RESPONSE TO INTERROGATORY NO. 42:

2 Owens-Illinois objects to this interrogatory on the
3 grounds that it seeks identification of all persons'
4 knowledgeable of a possible particular fact, and as such is
5 overly broad, unduly burdensome, oppressive and harassing.
6 This interrogatory is overly broad in calling for
7 identification of each person with possible knowledge of the
8 subject; many of the persons who possibly may be knowledgeable
9 are now deceased or cannot be located. Moreover, due to the
10 extensive passage of time that has occurred since the date
11 covered by this interrogatory, those who may have had knowledge
12 of this subject may not be able to recall such knowledge nor
13 the time during which it was acquired. It also calls for
14 information that Owens-Illinois has no reasonable access to and
15 requests information which is not in the control of
16 Owens-Illinois, its employees or agents, and as such is not
17 reasonably calculated to lead to the discovery of admissible
18 evidence. Owens-Illinois objects to any interrogatory in
19 regard to any time other than which it engaged in business
20 involved in this case on the basis such information is
21 irrelevant and is not calculated to lead to the discovery of
22 admissible evidence and as such is burdensom and oppressive.

23 RESPONSE TO INTERROGATORY NO. 43:

24 Owens-Illinois objects to answering this
25 interrogatory on the basis it is overbroad, vague, irrelevant
26 and not calculated to lead to the discovery of any admissible
27 evidence. Owens-Illinois objects to any interrogatory in
28 regard to any time other than which it engaged in business

involved in this case on the basis such information is irrelevant and is not calculated to lead to the discovery of admissible evidence and as such is burdensom and oppressive.

RESPONSE TO INTERROGATORY NO. 44:

Owens-Illinois objects to answering this interrogatory on the basis it is overbroad, vague, irrelevant and not calculated to lead to the discovery of any admissible evidence. Owens-Illinois objects to any interrogatory in regard to any time other than which it engaged in business involved in this case on the basis such information is irrelevant and is not calculated to lead to the discovery of admissible evidence and as such is burdensom and oppressive.

RESPONSE TO INTERROGATORY NO. 45:

Owens-Illinois objects to this interrogatory on the grounds that it seeks identification of all persons' knowledgeable of a possible particular fact, and as such is overly broad, unduly burdensome, oppressive and harassing. This interrogatory is overly broad in calling for identification of each person with knowledge of the subject; many of the persons who possibly may be knowledgeable are now deceased or cannot be located. Moreover, due to the extensive passage of time that has occurred since the date covered by this interrogatory, those who may have had knowledge of this subject may not be able to recall such knowledge nor the time during which it was acquired. It also calls for information that Owens-Illinois has no reasonable access to and requests information which is not in the control of Owens-Illinois, its employees or agents, and as such is not reasonably calculated

1 to lead to the discovery of admissible evidence.

2 Owens-Illinois objects to any interrogatory in regard to any
3 time other than which it engaged in business involved in this
4 case on the basis such information is irrelevant and is not
5 calculated to lead to the discovery of admissible evidence and
6 as such is burdensom and oppressive.

7 RESPONSE TO INTERROGATORY NO. 46:

8 Owens-Illinois objects to answering this
9 interrogatory on the basis it is overbroad, vague, irrelevant
10 and not calculated to lead to the discovery of any admissible
11 evidence. Owens-Illinois objects to any interrogatory in
12 regard to any time other than which it engaged in business
13 involved in this case on the basis such information is
14 irrelevant and is not calculated to lead to the discovery of
15 admissible evidence and as such is burdensom and oppressive.

16 RESPONSE TO INTERROGATORY NO. 47:

17 Owens-Illinois objects to answering this
18 interrogatory on the basis it is overbroad, vague, irrelevant
19 and not calculated to lead to the discovery of any admissible
20 evidence. Owens-Illinois objects to any interrogatory in
21 regard to any time other than which it engaged in business
22 involved in this case on the basis such information is
23 irrelevant and is not calculated to lead to the discovery of
24 admissible evidence and as such is burdensom and oppressive.

25 RESPONSE TO INTERROGATORY NO. 48:

26 Owens-Illinois objects to answering this
27 interrogatory on the basis it is overbroad, vague, irrelevant
28 and not calculated to lead to the discovery of any admissible

1 evidence. Owens-Illinois objects to any interrogatory in
2 regard to any time other than which it engaged in business
3 involved in this case on the basis such information is
4 irrelevant and is not calculated to lead to the discovery of
5 admissible evidence and as such is burdensom and oppressive.

6 RESPONSE TO INTERROGATORY NO. 49:

7 Defendant objects to Interrogatory No. 49 on the
8 basis that it is overly broad, vague and ambiguous. The
9 interrogatory also calls for information that defendant has no
10 reasonable access to and requests information which is not
11 within the personal knowledge or possession or control of
12 Owens-Illinois, its employees or agents and is therefore not
13 reasonably calculated to lead to the discovery of admissible
14 evidence and is burdensome and oppressive. Owens-Illinois
15 objects to any interrogatory in regard to any time other than
16 which it engaged in business involved in this case on the basis
17 such information is irrelevant and is not calculated to lead to
18 the discovery of admissible evidence and as such is burdensom
19 and oppressive.

20 RESPONSE TO INTERROGATORY NO. 50:

21 Owens-Illinois objects to this interrogatory on the
22 grounds that it seeks identification of all persons'
23 knowledgeable of a possible particular fact, and as such is
24 overly broad, unduly burdensome, oppressive and harassing.
25 This interrogatory is overly broad in calling for
26 identification of each person with knowledge of the subject;
27 many of the persons who possibly may be knowledgeable are now
28 deceased or cannot be located. Moreover, due to the extensive

1 passage of time that has occurred since the date covered by
2 this interrogatory, those who may have had knowledge of this
3 subject may not be able to recall such knowledge nor the time
4 during which it was acquired. It also calls for information
5 that Owens-Illinois has no reasonable access to and requests
6 information which is not in the control of Owens-Illinois, its
7 employees or agents, and as such is not reasonably calculated
8 to lead to the discovery of admissible evidence.

9 Owens-Illinois objects to any interrogatory in regard to any
10 time other than which it engaged in business involved in this
11 case on the basis such information is irrelevant and is not
12 calculated to lead to the discovery of admissible evidence and
13 as such is burdensom and oppressive.

14 RESPONSE TO INTERROGATORY NO. 51:

15 Defendant objects to Interrogatory No. 51 on the
16 basis that it is overly broad, vague and ambiguous. The
17 interrogatory also calls for information that defendant has no
18 reasonable access to and requests information which is not
19 within the personal knowledge or possession or control of
20 Owens-Illinois, its employees or agents and is therefore not
21 reasonably calculated to lead to the discovery of admissible
22 evidence and is burdensome and oppressive.

23 Owens-Illinois objects to any interrogatory in regard
24 to any time other than which it engaged in business involved in
25 this case on the basis such information is irrelevant and is
26 not calculated to lead to the discovery of admissible evidence
27 and as such is burdensom and oppressive.

1 RESPONSE TO INTERROGATORY NO. 52:

2 Owens-Illinois objects to this interrogatory on the
3 grounds that it seeks identification of all persons'
4 knowledgeable of a possible particular fact, and as such is
5 overly broad, unduly burdensome, oppressive and harassing.
6 This interrogatory is overly broad in calling for
7 identification of each person with knowledge of the subject;
8 many of the persons who possibly may be knowledgeable are now
9 deceased or cannot be located. Moreover, due to the extensive
10 passage of time that has occurred since the date covered by
11 this interrogatory, those who may have had knowledge of this
12 subject may not be able to recall such knowledge nor the time
13 during which it was acquired. It also calls for information
14 that Owens-Illinois has no reasonable access to and requests
15 information which is not in the control of Owens-Illinois, its
16 employees or agents, and as such is not reasonably calculated
17 to lead to the discovery of admissible evidence.

18 Owens-Illinois objects to any interrogatory in regard to any
19 time other than which it engaged in business involved in this
20 case on the basis such information is irrelevant and is not
21 calculated to lead to the discovery of admissible evidence and
22 as such is burdensom and oppressive.

23 DATED: *Sept 1-89*

24 MORGENSTEIN & JUBELIRER

25
26 By *Karlin Gould*
27 Karlin Gould
28 Attorneys for Defendants
FIBREBOARD CORPORATION,
PITTSBURGH-CORNING
CORPORATION, OWENS-ILLINOIS,
INC.

PROOF OF SERVICE

I, Julie Galdieri, do hereby declare and state:

I am employed in the City and County of San Francisco, California. I am over the age of 18 years and not a party to the within action. My business address is The Federal Reserve Bank building , 101 Market Street, Suite 601, San Francisco, California, 94105.

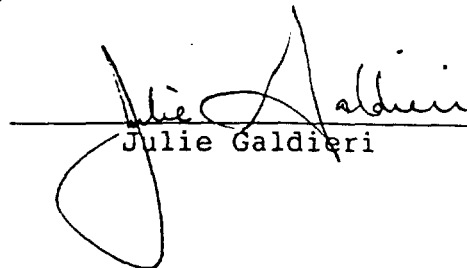
On September 1, 1989, 1989, I served the within:

DEFENDANT OI'S ANSWERS TO INTERROGATORIES

on the parties in this action, by placing a true copy thereof in a sealed envelope, and each envelope addressed as follows:
SEE ATTACHED LIST

- X (By Mail) I caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail at San Francisco, California.
- (By Personal Service) I caused each such envelope to be delivered by hand to the offices of each addressee above.
- (By Telecopier) I caused each such document to be Telefaxed by telecopier to the offices of each addressee above.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st of September, 1989 at San Francisco, California.



Julie Galdieri

ABRAHSON & SMITH 44 Montgomery Street San Francisco, CA 94104 (415) 421-7995	/	F. WILLIAM DORLAND 1343 Alpine Road, Suite 110 Walnut Creek, CA 94596 (415) 938-1200	/
BROCE L. AMFELDT 700 Franklin Street Hapa, CA 94559 (707) 224-6547	/	FRIEDMAN, COLLARD, ET AL. Suite 300 7750 College Town Drive Sacramento, CA 95826 (916) 381-9011	/
ROGER BALT, ESQ. P.O. Box 12095 Oakland, CA 94604 (415) 420-1664	/	GALLARDO & BAWES 277 W. Hedding St. San Jose, CA 95116 (408) 287-7720	/
BERMAN & BERMAN 237 Georgia Hall South Vallejo, CA 94590 (707) 552-7900	/	GOULD & SAYRE 10351 Santa Monica Blvd., Suite 406 Los Angeles, CA 90025	/
MELVIN M. BELLI, SR. 215 North San Joaquin Street Stockton, CA 95202	/	CHRISTOPHER GRELL, ESQ. 101 Howard St., Suite 222 San Francisco, CA 94105	/
BROWN & FINNEY One Maritime Plaza, Ste. 1250 San Francisco, CA 94111 (415) 392-2255	/	BALLEY, CORNELL & INCE 325 Market St., Suite 3700 San Francisco, CA 94105 (415) 495-8800	/
BRUYNEEL & O'SULLIVAN 165 Fell Street San Francisco, CA 94102 (415) 864-2429	/	JEFFREY BARRISON, ESQ. One Daniel Burnham Court, Suite 220 San Francisco, CA 94105	/
CAPUTO, LICCARDO, ROSSI, STORGES & McNEIL, INC. 1960 The Alameda Suite 200 San Jose, CA 95126 (408) 244-4570	/	BERRON & BERON 600 Montgomery St., 33rd Fl. San Francisco, CA 94111 (415) 788-2500	/
CARLSON, ROBINSON & BUSICK 1709 Webster Street Oakland, CA 94612 (415) 451-6400	/	HILL, SCHWARTZ & STENSON 722 Montgomery St., 2nd Fl. San Francisco, CA 94111 (415) 398-2434	/
CARNES, ADVE & DIBBLE Three Embarcadero Center, #670 San Francisco, CA 94111 (415) 434-4890	/	BOBERG, FINGER, BROWN, COX & MOLLIGAN 703 Market St., 18th Fl. San Francisco, CA 94105 (415) 543-9464	/
CARTWRIGHT, SLOBODIN, ET AL. 101 California Street, Suite 2400 San Francisco, CA 94111 (415) 433-0440	/	JARVIS MILLER, BRODSKY & RASKIN, INC. 221 Main St., Suite 1001 San Francisco, CA 94105	/
CASEY, GERRY, CASEY, INC. WESTBROOK & REED, INC. 110 Laurel Street San Diego, CA 92101 (619) 238-1811	/	KAZAN & MCCLAIN STEVEN KAZAN, ESQ. 171 Twelfth St., Suite 300 Oakland, CA 94607 (415) 465-7728	/
LAW OFFICES OF JACK CLAPPER 100 Shoreline Highway Building B, Suite 300 Mill Valley, CA 94941	/	GEORGE W. KILBOURNE, ESQ. 3755 Alhambra Ave., Suite 10 Martinez, CA 94553 (415) 372-3304	/
COLLINS, SCHWARTZ & STARITA 2721 Chab Road Walnut Creek, CA 94596	/	WILLIAM G. KINDER, ESQ. 84 West Santa Clara St., Suite 770 San Jose, CA 95113 (408) 287-6080	/
COTCHETT & ILLSTON 840 Mission Road, Suite 200 Berkeley, CA 94701 (415) 434-1390	/	KENNETH L. KNAPP, ESQ. 1109 Quail St. Newport Beach, CA 92660 (714) 851-1200	/
DAVIS & LEWIS 2121 Avenue of the Stars, Suite 3100 Los Angeles, CA 90067 (213) 552-2121	/	NORMAN J. LANDAU, ESQ. 233 Broadway New York, NY 10007	/
125 12th Street, Suite 105 Oakland, CA 94607 (415) 452-5024 (Use for Alameda Davis/Lewis Cases)	/	LIEDERMAN & ANGELIDES 2201 Broadway, Suite 311 Oakland, CA 94612 (415) 763-7700	/
DIGAKOTI & CAMPBELL EDWARD M. DIGARDI, ESQ. 436 Fourteenth St., Suite 616 Oakland, CA 94612 (415) 833-5409	/	EMANUEL & INCE 441 North First St. San Jose, CA 95112 (408) 286-3710	/
PETER DIXON, ESQ. 650 California St., Suite 2600 San Francisco, CA 94108	/	MCCARTHY, JOHNSON & MILLER 22 2nd St., 7th Fl. San Francisco, CA 94105 (415) 362-0726	/
	/	BRAYTON & ASSOCIATES 999 Grant Avenue Novato, CA 94947 (415) 898-1555	/
	/	WALTER H. MEDAK, ESQ. 647 Aquista Drive Moraga, CA 94556 (415) 376-8584	/
	/	ORECK & ORECK 428 Thirteenth St., Suite 240 Oakland, CA 94612 (415) 444-1555	/
	/	WILLIAM PARRISH, ESQ. 1255 Post St., Pch., Ste. 1100 San Francisco, CA 94109 (415) 928-4800	/
	/	JOHN C. ROBINSON, ESQ. 940 Adams St., Suite B Berkeley, CA 94510 (408) 745-0515	/
	/	LAW OFFICES OF ARTHUR SHERMAN 9720 Wilshire Blvd., Suite 1500 Beverly Hills, CA 90212 (213) 275-5077	/
	/	SMYKE, CRODOS, SILBERFELD & ANTEAU 2300 Wilshire, Suite 900 Los Angeles, CA 90048 (714) 853-0214	/
	/	STEVEN STEIN, ESQ. One Embarcadero Center, Suite 2112 San Francisco, CA 94111	/
	/	STEMPLE & BOVALJIAN 1526 Tennessee St. Vallejo, CA 94590 (707) 552-2064	/
	/	1888 Century Park East, Suite 900 Century City, CA 90067 (213) 556-2645	/
	/	LAW OFFICES OF STERNS 280 Utah Street San Francisco, CA 94103 (415) 626-1000	/
	/	ERNEST M. TRAYER, ESQ. One Maritime Plaza The Alcoa Bldg., Suite 1250 San Francisco, CA 94111 (415) 392-2255	/
	/	TIERNAN & SMITH 165 Fell Street San Francisco, CA 94102 (415) 621-0761	/
	/	WELTIN, VAN DAM & FLORES 444 Market Street, Suite 930 San Francisco, CA 94111 (415) 433-4500	/
	/	WYLLIE, MCBRIDE, DESIGNER & SURE 401 Park Center Plaza, Suite 1001 Market and Park, Sausalito San Jose, CA 95113 (408) 297-9172	/
	/	NICHOLAS ZOLLER, ESQ. 2033 Teesdale Blvd., Suite 1401 703 Market Street, Suite 1401 San Francisco, CA 94103	/

RECEIVED AUG 04 1989

MARVIN D. MORGENSTEIN*
ELIOT S. JUBELIRER
LEE ANN HUNTINGTON
JEAN L. BERTRAND
JEFFREY R. WILLIAMS
JAMES R. BALICH
ROCKY N. UNRUH

MORGENSTEIN & JUBELIRER
THE FEDERAL RESERVE BANK BUILDING
101 MARKET STREET, SIXTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105
(415) 896-0666
FAX (415) 896-5592

LAURIE K. ANGER
ROBERTA NICOL DEMPSTER
DENNIS M. FARIAS
KARLIN GOULD
KIRSTEN HOWE
LARRY C. LOWE
JAMES L. MCGINNIS
ELIZABETH MEYER
ROBERT B. MULLEN
ROBERT O'BRIEN
JOHN J. PETRY
KERRY R. STOEENR
DAVID E. STUMBOS
CYRIAN B. TABUENA

*A PROFESSIONAL CORPORATION

August 4, 1989

HAND DELIVERED

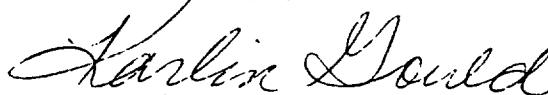
Ms. Jackie Goldsley
Kazan & McClain
171 - 12th Street, Suite 300
Oakland, California 94607

Re: Willie Coleman, #650495-3
IN RE: COMPELX ASBESTOS LITIGATION NO. 607734-9
IN RE SHIPYARD AND APPLICATOR ASBESTOS CASES
(Consolidated for Discovery No. 537868-7)

Dear Ms. Goldsley:

Enclosed are the responses for Owens-Illinois Inc. As we have discussed before, the verification is a copy. If there are questions concerning this matter, please feel free to call me.

Very truly yours,


Karlin Gould

KG/gg:WPMAG-691:06600.00001
Enclosure

cc: Sally Tay Howe

MARVIN D. MORGENSTEIN*
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July 28, 1989

FAX # (415) 835-4913

Ms. Jackie Goldsky
Kazan & McClain, P.C.
171 - 12th Street
3rd Floor
Oakland, CA 94607

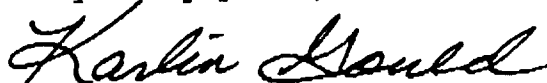
Re: Extension of Time for Owens-Illinois Response
to interrogatous (Willie Coleman)

Dear Ms. Goldsky,

This letter is to confirm that I informed you of an extension of time for responses on behalf of Owens-Illinois that Mr. Kazan and Ms. Jean Bertram agreed upon today. Mr. Kazan agreed to extend the response time to August 4, 1989.

If you have any further questions, please feel free to call me.

Very truly yours,



Karlin Gould

KG/kc

WPTEMP-117/06600-90867

MARVIN D. MORGENSTEIN*
ELIOT S. JUBELIRER
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ROBERT O'BRIEN
JONATHAN M. PEREZOUS
KERRY R. STOEGBNER
DAVID E. STUMBOS

*A PROFESSIONAL CORPORATION

July 26, 1989

BY FACSIMILE

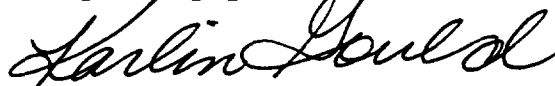
Ms. Jackie Goldsby
Kazan & McClain
171 - 12th Street, Suite 300
Oakland, CA 94607

Re: ALAMEDA COUNTY (SHIPYARD AND APPLICATOR ASBESTOS
CASES) INTERROGATORIES

Dear Jackie:

Pursuant to our conversation, Owens-Illinois is sending the answers to the interrogatories immediately to me. You have agreed to an extension to those answers to July 28, 1989. As soon as I receive the answers from Owens-Illinois, I will have those answers personally messengered to you on or before July 28, 1989.

Very truly yours,



Karlin Gould

KG/ya:WPYXA-118
6600.0001

cc: Federal Expressed to
Jennifer Jones - Owen-Illinois

MARVIN D. MORGENSTEIN*
ELIOT S. JUBELIRER
LEE ANN HUNTINGTON
JEAN L. BERTRAND
JEFFREY R. WILLIAMS
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JONATHAN M. PEREZOUS
KERRY R. STOEHRER
DAVID E. STUMBOS

*A PROFESSIONAL CORPORATION

July 26, 1989

BY FACSIMILE

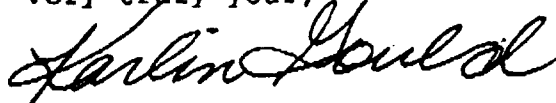
Ms. Jackie Goldsby
Kazan & McClain
171 - 12th Street, Suite 300
Oakland, CA 94607

Re: ALAMEDA COUNTY (SHIPYARD AND APPLICATOR ASBESTOS
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Very truly yours,


Karlin Gould

KG/ya:WPYXA-118
6600.0001

CC: Federal Expressed to
Jennifer Jones - Owen-Illinois