

FILE NAME: Carlisle (CARL)

DATE: 1995

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DOCUMENT DESCRIPTION: Legal - Further Defendant Answers to Plaintiffs' 2nd Set of Interrogatories

IN THE CIRCUIT COURT
OF THE EIGHTH JUDICIAL CIRCUIT
CASS COUNTY, ILLINOIS

ROSE SPEARS, As Special Administrator	)	
for WILLIAM SPEAR, Deceased,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 92-L-3
	)	
A. P. GREEN, et al.,	)	
	)	
Defendants.	)	

**FURTHER SUPPLEMENTAL ANSWERS
OF DEFENDANT CARLISLE CORPORATION
TO CERTAIN OF PLAINTIFF'S SECOND SET OF INTERROGATORIES**

Defendant Carlisle Corporation, by its attorneys, provides the following supplemental answers to plaintiff's Second Interrogatories in the above-captioned matter as follows:

I. PRELIMINARY STATEMENT

These questions or requests are answered with respect to Motion Control, Inc., a subsidiary of Carlisle Corporation. These questions or requests are answered on the basis of information presently known to the person or persons who prepared the answers. Because much of the information which is the subject of these questions or requests is historical in nature, and considerable time may have passed since the events or dates in question, these answers are subject to the discovery of any additional information.

These answers are intended to be accurate to the best of the answering person's knowledge and belief as of the time of the answer. To the extent that they are not consistent with any previous answers, including answers and discovery in other cases,

these answers are intended to supplement and supersede such earlier answers. Defendant reserves the right to supplement these answers. Furthermore, the information contained in these answers may be superseded by further discovery in this or future matters.

Unless otherwise stated, this further supplemental response incorporates all prior answers to discovery by answering defendant.

II. FURTHER SUPPLEMENTAL ANSWERS TO CERTAIN OF PLAINTIFF'S SECOND INTERROGATORIES

17. Please state whether or not Defendant ever obtained any knowledge concerning the likelihood of asbestos being hazardous to human health. If so, please state:

- (a) When Defendant first became aware of the hazardous potential of asbestos dust and asbestos fibers;**
- (b) The manner in which the Defendant, Defendant's predecessor, or Defendant's subsidiary companies first obtained this knowledge and became aware of said hazards and from what source this information was obtained.**

ANSWER: Unknown at this time.

18. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of cancers including, but not limited to gastrointestinal cancer, laryngeal cancer, renal cancer, lymphoma and lung cancer. As to each cancer, state the source of that information, including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER: See answer to Interrogatory 17.

19. Please state when Defendant first became aware of the possible association between inhalation of asbestos dust and/or fibers and the contraction of mesothelioma and peritoneal mesothelioma. State the source of that information including a description of all tests conducted relative to the possibility of such a relationship.

ANSWER: See answer to Interrogatory 18.

20. Please state when Defendant first became aware of the association between the inhalation of asbestos dust and/or fibers and contraction of lung disease known as asbestosis and state the source of that information including a description of all tests conducted relative to possibility of such a relationship.

ANSWER: See answer to Interrogatory 18.

28. Does Defendant maintain a library dealing with industrial hygiene, medicine, safety and engineering and/or research? If so, state:

- (a) The date each such library was established;
- (b) The location of each library;
- (c) The name(s) of the librarian(s) since 1930;
- (d) List all journals subscribed to by you concerning asbestos, industrial hygiene, medicine, safety, and/or engineering;
- (e) List all books and articles dealing with asbestos and asbestos-related diseases and the date acquired.

ANSWER: See previous answer. Defendant has no such library. Robert M. Tami recalls that he has obtained copies of the following around the time indicated:

- (a) Peters, G., et al., Sourcebook on Asbestos Diseases (Garland Publishing, NY 1980). Date of purchase or acquisition unknown.
- (b) Rajhans, G., Bragg, G., Engineering Aspects of Asbestos Dust Control (Ann Arbor Science Publishers, 1978). Date of purchase or acquisition unknown.

Dated: April 24, 1995



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