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June 25, 1985



Dr. Barry Castleman
1722 Linden Ave.
Baltimore, Maryland 21217

Dear Barry:

I certainly appreciate the hospitality you extended to Larry and myself when we were in Baltimore. Your assistance has proven to be, and will continue to be, very helpful. I talked with Bert Danziger from Los Angeles and he indicated you were curious about what happened to the Saranac documents that Owens-Illinois had concerning kaylo. On February 11, 1981 in cause number 80-0180AP in the United States District Court for the District of Maine, Lawrence Kimble v. Johns-Manville Corporation, et al, the deposition of Willis Hazard was taken. On page 49 of his deposition, the following question and answer appeared:

"Question: And when the kaylo division was sold to Owens-Corning, what happened to your file?

Answer: The last day that they were part of Owens-Illinois we got some corrugated paper cartons, unloaded our file cabinet, called the janitor at the end of the afternoon, and had them carried over to Owens-Corning."

I am sending you copies of pages 49 and 50 of the deposition. Should you require anything else, please let me know.

Very truly yours,

ROBERT E. BALLARD
For the Firm

REB:dh
Enlosures
cc: Mr. Lawrence Madeksho

Q Now, you are familiar with the fact that the Kaylo Division was sold to Owens-Corning in May of 1958?

A Yes, sir.

Q And you knew about that during the time that the sale was being consummated and the transfer occurred?

A I don't remember when I knew it. 1958 stands out when the final thing was accomplished.

Q Did you at any time tell anybody from Owens-Corning about the Saranac study dealing with Kaylo?

A I don't remember.

Q Do you remember if there was someone who you would consider a counterpart at Owens-Corning, someone that you may have dealt with or discussed industrial hygiene problems at Owens-Corning?

A At what period?

Q During 1958.

A I don't remember that.

Q Did you maintain a file dealing with the Saranac study, the letters from Dr. Vorwald, and the reports?

A Yes.

Q And when the Kaylo Division was sold to Owens-Corning, what happened to your file?

A The last day that they were part of Owens-Illinois we got some corrugated paper cartons, unloaded our file cabinet, called the janitor at the end of the afternoon, and had them carried over to Owens-Corning.

Q Is this as a result of some instruction or memorandum or directive generally to transfer documents dealing with Kaylo to Owens-Corning?

A I don't remember whether it was or not. I know we did that.

Q You did do it?

A Yes.

Q And in addition to your files, were other files also turned over to Owens-Corning at that time?

MR. KELLEY: Object.

A Yes.

Q What other files were turned over to Owens-Corning that you know of?

A I don't know what they were. I don't know what files went over. I know ours did.

Q And that would include the documents that have been marked today?

A I don't know whether all of those documents were in that file or not, but we sent over material