

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

D. GARLAND MOORE,	:	AT LAW NOS. 13603-S,
	:	14062-S & 14577-S
	:	
WILLIAM L. KELLEY,	:	AT LAW NO. 13945-S
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
H.K. PORTER COMPANY, INC.,	:	
et al.	:	
	:	
Defendants.	:	

**RESPONSES OF DEFENDANT MANVILLE
CORPORATION ASBESTOS DISEASE
COMPENSATION FUND TO
PLAINTIFFS' INTERROGATORIES**

Defendant Manville Corporation Asbestos Disease Compensation Fund (hereafter "the Fund"), by and through its attorneys, KNIGHT, DUDLEY, DEZERN & CLARKE, hereby submits the following Responses to Plaintiffs' Interrogatories.

PRELIMINARY MATTERS

The Fund objects to these discovery requests to the extent that they ask for information relating to the Fund's involvement in the asbestos industry. The Fund has never been involved in the manufacture, sale or distribution of asbestos or asbestos containing products. Nevertheless, the Fund interprets these questions to relate to Manville Corporation, its predecessors or subsidiaries (hereafter "related entities").

The Fund objects to these discovery requests to the extent that they call for production of documents entitled to protection as privileged attorney client communications or attorney work product.

To the extent that the information contained herein differs in any respect from any prior response to discovery, these answers shall be deemed to update and supersede such prior answers in any and all cases. The Fund reserves the right to supplement these responses to the extent that new or additional information becomes available.