PLAINTIFF'S EXHIBIT

RFP-4

CURRAN, MYLOTTE, DAVID & FITZPATRICK
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VICTOR DERRICK	:	COURT OF COMMON PLEAS
	:	OCTOBER TERM, 1979
v.	:	
RAILROAD FRICTION PRODUCTS CORP.,etal.	:	NO. 1298

ANSWER OF DEFENDANT, RAILROAD FRICTION PRODUCTS CORPORATION TO PLAINTIFF'S INTERROGATORIES

TO ALL ATTORNEYS OF RECORD

In accordance with the applicable court rules, Defendant, Railroad Friction Products Corporation hereby answers Plaintiff's Interrogatories served on Defendant's counsel.

Defendant reserves the right to amend or supplement its answers if it finds that inadvertent omissions or errors have been made or if additional or more accurate information becomes available that is required to be provided by said rules.

Defendant objects to the definitions on these Interrogatories as set forth by Plaintiff. Such definitions directly contradict the normal or common understandin of the defined words such that when employed in the specific Interrogatories, the question is confusing, distorted, misleading and overly broad.

Defendant will, however, answer these Interrogatories to the best of its knowledge of the facts in the case at bar.

1. Please identify each person who has supplied information used in answering these interrogatories and specify the interrogatories for which he is responsible by adding in ( ) the name of such person or persons.

ANSWER: This document is signed solely by EDWARD J. DAVID, ESQ. to satisf the rules of procedure, as no single officer or agent of Defendant has the exclusive knowledge or information required to supply the necessary answers. Answers were prepared from a number of sources; i.e., files, records and interviews with various individuals. The above signing officer has been informed that those files, documents and interviews support the responses herein based upon a diligent search of available information conducted as of the date of signature.

2. Identify each person who was questioned or consulted in order to answer these interrogatories.

ANSWER: See Interrogatory No. 1.

3. Identify each document that was examined, reviewed, and/or used in answering each interrogatory and specify the interrogator

ANSWER: See Interrogatory No. 1.

4. Please state whether or not you are a corporation. If so, state:

(a) Your correct corporate name;
(b) The state of incorporation;
(c) The date of your incorporation;
(d) The address of your principal place of business;
(e) The address of any other places of business;
(f) Whether or not you have ever held a certificate of authority to do business in this state;
(g) Whether or not you have a registered agent for the purpose of accepting service in this state, and if so, the name and present address of that agent;
(h) State your corporate purposes;
(i) State whether or not you have or have had subsidiary or predecessor corporation(s), and if so:
1. The name of the subsidiary and/or predecessor;
2. Its date(s) of incorporation, if a corporation;
3. Its state(s) of incorporation;
4. Its corporate purposes.
(j) Is your business entity a product of merger, consolidati or some other mechanism.
(k) Identify each such merger, consolidation and when it occurred.

ANSWER:

(a) Railroad Friction Products Corporation

(b) Delaware

(c) December 13, 1954

(d) Laurinburg, North Carolina

(e) Business office, c/o Johns-Manville, P.O. Box 105545, Atlanta, Georgia 30348

(f) Yes

(g) CT Corporation System, 123 South Broad Street, Philadelphia, PA 19109

(h) Attached as Exhibit I

(i) No

(j) No

(k) N/A

5. State whether you have controlled, purchased or in any way acquired any interest in any corporation or business entity which has mined, manufactured, produced, processed, compounded, converted, sold, merchandised, supplied, distributed, and/or otherwise placed in the stream of commerce, asbestos products and if so, state:

(a) The name and address of said corporation or business entity;
(b) The date(s) you controlled, purchased or acquired any interest;
(c) The manner of acquisition, including percentage of ownership;
(d) Identify all documents with respect to the above;

ANSWER: No.

6. State whether you have at any time directly or indirectly been engaged in the mining, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distributing, and/or otherwise placing in the stream of commerce asbestos products. If so, be specific in your answer and state as to each such asbestos product:

(a) The trade name, general name and/or other identification of each asbestos product;
(b) The dates during which you mined, manufactured, supplied, distributed, and/or otherwise placed in the stream of commerce each such asbestos product;
(c) The intended use of each such asbestos product;
(d) Furnish a complete description of each such asbestos product including the type of asbestos contained therein and the percentage of asbestos contained in said product;
(e) Describe the physical appearance including color of each such product specifying whether the said product was/is sold in a solid, loose, powdered or other form;
(f) Identify the location of each plant or facility which produces each of the aforesaid asbestos products;

ANSWER: (a) COBRA® Brake Shoes;

(b) 1955 - 1980;

(c) Brake shoe linings for on-rail vehicles for breaking the vehicle;

(d) COBRA® Brake Shoes. The wear stop of the COBRA® Brake Shoes has contained chrysotile asbestos as an ingredient. The percentage of chrysotile has varied throughout the years, but has ranged from 6% to 12.3%. As of 1980 the chrysotile was removed from the COBRA® Brake Shoes.

(e) Solid form, black or red color;

(f) Laurinburg, N. C.
Asbestos, Quebec.

11. Identify each business entity from whom you have received raw asbestos including;
(a) The date(s);
(b) Amount;
(c) [illegible]
(d) Identify and produce all documents relating to such purchase;

ANSWER: Defendant objects to this Interrogatory on the grounds that the same is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence in the case at bar.

12. Identify each business entity from whom you have received finish asbestos products indicating;
(a) The date(s);
(b) Amount(s);
(c) Types received;
(d) Identify and produce all documents relating thereto;

ANSWER: Not applicable.

13. Set out the periods of time in which you sold asbestos products, the names of asbestos products sold to the B & O Railroad or Chessie System at 38th and Jackson Sts. and the varieties and types and quantities of asbestos products sold during the period 1940-1980 to such yard or to distributors for sale to railroad yards.

ANSWER: Defendant states that from 1955 through 1969, there are no records available. A search is currently being made from 1970 on, and this answer will be supplemented when this material is located.

14. Did you, at any time franchise, assign or license any of you asbestos products to any person, firm or corporation? If so, st
(a) Identify the assignors or licensee;
(b) The purpose of such assignment or license;
(c) The name(s) of the product(s) so assigned or licensed;
(d) The time period of the assignment(s) or license;
(e) Identify and produce all documents relating to such assignment or license;

ANSWER: No.

15. Did you rebrand any of your asbestos products for other companies or did other companies rebrand their products for you? If so,
(a) Identify such companies;
(b) Indicate the specific products rebranded for each company;
(c) The dates of each such rebranding; That is, did you manufactu or acquire asbestos products and affix the names of other companies to the product or its containers or did they perform this service for you?

ANSWER: No.

16. Since the initial date of said mining, manufacturing, producing, processing, compounding, converting, selling, merchandising, supplying, distribution and/or otherwise placing in the stream of commerce your asbestos products as specified in the answer to No. 6, [illegible] whether or not there have been any alterations or changes, then as to such alterations or changes, state:
(a) The trade name(s) of each such product(s);
(b) The date(s) each such product(s) was altered or changed;
(c) The specific nature and date(s) of each such alteration or change of composition.
(d) The reason for each alteration or change of composition;

ANSWER: (a) COBRA Brake Shoes;

(b) At various times from 1955 through 1981;

(c) Defendant objects to this subpart on the grounds that the same is proprietary information and giving same constitutes a trade secret;

(d) To provide a suitable product for the application intended based on service experience.

17. Describe in detail the packages in which you would distribute or deliver or place in the stream of commerce that would reach the place of employment of Plaintiff or could reach that place since 1940 setting forth:
(a) The type of box or package used;
(b) The date each type of box or package was used;
(c) A physical description thereof, including the size and color of the box or package;

(d) A description of size and color of any printed material that appeared on or in said box or package stating;
1. A verbatim statement of any warnings or cautions;
2. The date(s) each such warning or caution was first used and last used.
(e) Identify and produce a copy of said warning or caution.
(f) Source of container.
(g) Source of printing on the container including contracts for such printing.

ANSWER: (a) Cardboard box or wooden crate;

(b) Continuous;

(c) Various sizes from 18"X32" to 37 1/2"X37 1/2". Brown cardboard or wooden slats;

(d) None shown;

(e) None;

(f) Unknown;

(g) Unknown.

... releasing the asbestos product(s) listed in interrogatory 6 to the public, were any tests conducted on same to determine potential health hazards involved in the use, handling or exposure of the materials contained therein: If so, state:

(a) The identity of each individual or firm who conducted such tests;

(b) The date, purpose and result of each such test;

(c) Identify and produce all documents relating to such tests;

(d) The costs of test.

(e) The grants for purposes of tests.

ANSWER: (a) Westinghouse Air Brake Division, Dynamemeter Tests in 1971. Johns-Manville Corporation, Field Tests in 1977;

(b) Westinghouse Air Brake Division Test in 1971 determined that less than 1% of the original asbestos fiber in the shoe remained as fiber and less than 1/10 of that amount became air borne. Johns-Manville Corporation Field Tests in 1977 in Boston, Massachusetts disclosed that no significant fiber counts were obtained;

(c) To be provided after they are located;

(d) No costs recorded;

(e) No grants obtained.

19. Did you make any changes in your asbestos products as a result of such test(s) as to each change, state:

(a) The product changes;
(b) the nature of the change made;
(c) The purposes of the change;
(d) The date of such change:
(e) The identity of each person or firm responsible for making the change.

ANSWER: No.

20. After releasing any of the asbestos products listed in your answer to Interrogatory 6 to the public, were any tests conducted [illegible] potential health hazards involved in the use [illegible] exposure to the asbestos materials contained therein? If so, please state:

(a) The identity of each person for firm conducting such tests:

(b) The date, purpose and result of said test;

(c) Identify and produce the documents relative to the above tests.

ANSWER: See Answer to Interrogatory No. 18.

21. Did you make any changes as a result of such tests? If so, please state:

(a) The product(s) changed;

(b) the nature of the change made;

(c) The purpose and date of such change;

(d) The identity of each person responsible for making such change;

(e) Identify and produce the documents relating to such change.

ANSWER: See Interrogatory No. 19.

22. Has any written material of any kind been prepared by you or o[illegible] indicating how your product(s) should be used, applied or handled by the ultimate consumer: If so, please state:
(a) Identify each person or firm who prepared same;
(b) Identify each person or firm who presently has possession of same;
(c) The date(s) and manner in which said material was distributed to purchasers or users of your product(s);
(d) Identify and produce all applicable documents.

ANSWER: No.

23. If there have been any changes in any labels, inserts or other information which has ever accompanied any of your products as it was placed on the market, state the reasons therefore and the name and address of the person who recommended or ordered the change.

ANSWER: Only with regard to rejection lugs.

24. State the names, titles and addresses of defendant's advertisi agents who are employed or used in connection with the promotion o the product(s) specified in answer to interrogatory 6, and give a summary of all the instructions given to such agents regarding the uses, safety, and health related effects of the use of the product and their obligations to provide this information to customers.

ANSWER: MARSTELLER, INC.
600 GRANT STREET
PITTSBURGH, PENNSYLVANIA 15219

No instructions issued.

23. Have you at any time published and/or distributed any documen containing any warnings concerning the possibility of illness, disease, or injury resulting from the use of or exposure to the asbestos products listed in answer to interrogatory 6. If so, state:

(a) The wording of each such warning;
(b) A description of each such document;
(c) The method used to distribute the warnings to persons who are likely to use, handle or be exposed to your product(s);
(d) The date(s) such warning was issued;
(e) Identify each person who presently has possession of the above-described documents;
(f) Identify and produce all the documents mentioned in parts (a) through (e) of this question;
(g) In particular, was any warning ever given, either in writin or in any other way concerning the possibility of the illness as known as cancer resulting from the use of or exposu to any of the asbestos products listed in answer to interrogatory 6.
(h) How the document and the information involved were communica to purchasers of the product?

ANSWER: No.

26. Have you ever given any warnings to your employees of dangers illness and/or disease by reason of their use, handling or exposu[illegible] asbestos products. If so, state:

(a) The date of each such warning;

(b) How such warnings were given;

(c) If such warnings were oral, state the names and addresses of the person(s) giving and receiving such warnings;

(d) If such warnings were written, state;

1. The date(s) of such warning(s);
2. The present location of such warning(s);
3. The names and addresses of individuals who prepared such warning(s);
4. Where and/or how such warning(s) were posted,
5. The reasons for such warning(s).

(e) Whether or not in the course of such warnings, there was any warning concerning the possibility of contracting the disease know as cancer resulting from the use of or exposure to the asbestos products. in particular, whether there was any warning concerning that type of cancer known as mesothelioma.

ANSWER: No.

27. Were you ever advised by any member of the medical profession or other profession such as industrial hygienists, occupational hazard professions or other persons to utilize hazard labels on your products and to give clear and explicit warnings concerning the possibility of cancer, and/or mesothelioma and/or other serious illnesses and disease including but not limited to asbestos to users or might be exposed, or be exposed to your asbestos products after it have left your control? Identify this individual or individuals or company set forth the date of this advise, and attach copies of this advise if written.

ANSWER: No.

28. When, if at all, did you first become aware that airborne dust containing asbestos might be created in the course of removal of warn-out brake shoes? How did you become aware of this fact?

ANSWER: Defendant states that there is no danger in removal of worn-out railroad brake shoes. See tests referred to in answer to Interrogatory No. 18.

hazardous, toxic, dangerous, irritating, or a strong sensitiver? If yes, please state or identify:

(a) At what point in time you arrived at this conclusion
(b) How you arrived at this conclusion
(c) The person who made the decision
(d) Any documents, journals, articles, books used in this decision.

ANSWER: Defendant objects to the form of this question. Defendant has no information which indicates its product constitutes a health hazard.

28(b) Do you agree that when it has been determined that the inhalation of asbestos fibers or dust can be injurious to the health of the worker that worker has a right to such knowledge? If yes, please state or identify or attach.

(a) When you began to implement this policy
(b) Who decided to implement this policy
(c) At what meeting you decided to implement this policy
(d) Who was present
(e) Transcripts or minutes, if any, of the meeting.
(f) How the policy was carried out
(g) The documents used to implement this policy

ANSWER: Defendant objects to the form of this question. Defendant has no information which indicates its product constitutes a health hazard.

29. What is the Threshold Limit Value (i.e. how much asbestos vapo dust and fibers can one safely inhale, absorb or ingest without risking disease or illness?) In addition, state:

(a) When and where you obtained information concerning a Threshold Limit Value.

(b) [illegible] recognized any Threshold Limit Value from 1930 to 1978;

(c) Have you ever advised or warned those using your products of Threshold Limit Values? If so, describe exactly what and when and who advised an if any written advice or warning was given, produce such document.

(d) If you did not so advise, explain why you did not.

ANSWER: In 1971, an emergency standard of five fibers longer than 5 micrometers per cubic centimeter as an eight-hour time-weighted average and ten fibers longer than five micrometers per cubic centimeter maximum ceiling concentration was promulgated by OSHA and became their permanent standard effective June 7, 1972. This standard was changed July 1, 1976 by OSHA to two fibers longer than five micrometers per cubic centimeter as an eight-hour time-weighted average and ten fibers longer than five micrometers per cubic centimeter maximum ceiling concentration became effective. This Defendant has no information that its product caused exposure above TLV's or in any way constituted a health hazard.

30. If your answer to question 29, part (b) is in the affirmative, please explain whether the Threshold Limit Value is based on counts of all particles in the air or just the asbestos fibers in the air.

ANSWER: See Answer to Interrogatory No. 29.

31. When did defendant know that any governmental or private agency or other entity, issued guidelines suggesting Threshold Limit Values for exposure to asbestos dust? If ever:
(a) Identify the agency or entity issuing the guideline;
(b) State the content of the guideline(s) verbatim;
(c) State the date issued and the date you first knew the purpose of the guideline(s).

ANSWER: Defendant states that it was familiar with the standards as referred to in the answer to Interrogatory No. 29.

32. Does the defendant contend that the asbestos products mined, manufactured, produced, processed, compounded, converted, sold, merchandised, supplied, distributed and/or otherwise placed in the stream of commerce by the defendant are not "hazardous substances," as defined in 15 U.S. Code, Section 1261 (f)? If so, state the facts, opinions or conclusions upon which defendant relies to support such contention, and identify each document which is applicable. This interrogatory is to be answered with regard to 15 U.S.C. §1261 (f) (1) (A) wherein the term "hazardous substance" is defined as "any substance or mixture of substances which (i) is toxic, (ii) is corrosive, (iii) is irritant, (iv) is a strong sensitiser, (v) is flammable, (vi) generates pressure through decomposition, heat, or other means, if such substance or mixture of substances may cause substantial personal injury or substantial illness during or as a proximate result of any customary or reasonable foreseeable handling or use, including reasonably foreseeable inges by children.

ANSWER: Defendant objects to this Interrogatory on the grounds that it calls for a legal conclusion and as such is not a proper Interrogatory. The question of whether asbestos is a substance defined by 15 U.S. Code, Section 1261 (f) is a question of law.

32(a) Are any of the asbestos products referred to in interrog number 6 and 31 toxic as defined by 15 U.S.C. §1261 (g) which d fines the term toxic: As"any substance(other than a radioactiv substance) which has the capactiy to produce personal injury or i[illegible] through ingestion, inhalation or absc [illegible] body surface."

ANSWER: See Answer to Interrogatory No. 32.

32(b) Are any of the ingredients contained in the asbestos prod referred to in interrogatories number 6 and 31 corrosive? (Thi interrogatory should be answered with regard to 15 U.S.C. §1261 wherein the term "corrosive" is defined as meaning "any substan which, in contact with living tissue (as distinguished from ina surfaces) would cause distruction of tissue by chemical action.

ANSWER: See Answer to Interrogatory No. 32.

32(c) If so, state:

(a) The name or chemical composition of each substance;

(b) What effect it has on living tissue;

(c) The proportion of this ingredient used in compounding the product.

ANSWER: Not applicable.

32(d) Are any of the ingredients contained in the asbestos produc referred to in interrogatories number 6 and 31 irritating? (This interrogatory is to be answered with regard to 15 U.S.C. §126[illegible](j) wherein the term "irritant" includes any substance that induces [illegible] inflammatory reaction or immediate, prolonged, or repeated contact with normal living tissue, but which does not cause destruction of such tissue by chemical action.)

ANSWER: See Answer to Interrogatory No. 32.

32(e) Are any of the ingredients used in the asbestos products referred to in interrogatories number 6 and 31 strong sensitizers? (This interrogatory is to be answered with regard to 15 U.S.C. §126 which defines the term "strong sensitizer" as a substance that caus contact with normal living tissue to an allergic or photodynamic process or hypersensitivity that is evident on re-application of the same substance.)

ANSWER: See Answer to Interrogatory No. 32.

(b) Test or studies by any independent organization;
(c) Tests conducted on humans or animals on your behalf or on behalf of any co-defendant in this action or [illegible] your answer to any of the subsections (a) through (c) is in the affirmative, for each test or study state:
1. The date it began;
2. The date it ended;
3. The procedure of the test or study;
4. The number of man hours spent on it;
5. The place where it was conducted.

ANSWER: Not to Defendant's present knowledge with regard to potential health hazards.

33(a) If your answer to 33(a), (b), or (c), or all of them are i: affirmative for each test or study state:

1. Was the use of your materials voluntered by or requested by the study group or test group.

2. Identify and attach as per Rule 4009 all correspondence between you and the test group relative to these tests or studies and the use of your materials.

ANSWER: Not applicable.

34. Have you, at any time, been a member of any "trade associatic or association" composed of other miners, manufacturers, supplier: distributors, producers, processors, compounders, converters, sellers, merchandisers, and/or anyone otherwise placing in the stream of commerce asbestos products? If so, state:

(a) Identify each such association or organization;
(b) The dates during which you were a member?
(c) The names of any publication published by or written by such association or organization;
(d) The dates and addresses of all other members;
(e) What meetings you attended and identify who attended;
(f) Who spoke at such meetings;
(g) Were transcripts or summaries or minutes or notes made of such meetings? If so, identify the above, tell specifically what was made and give the name, title and address of the person or persons who have custody of the transcripts and/or summaries and or minutes and/or notes mentioned above and state when and where counsel for the plaintiff may examine and copy these documents.

ANSWER: Not to the best of Defendant's present knowledge.

35. Have you, at any time, been a member of and/or contributed to the Industrial Hygiene Foundation: If so, state:

(a) The dates you were a member and/or contributed;
(b) The identifications of any publication of any such organization;
(c) What meetings you attended and who attended;
(d) Who spoke at such meetings;
(e) Were transcripts or summaries or minutes or notes made of such meetings? If so, identify the above, tell specifically what was made and give the name, title and address of the person or persons who have custody of the transcripts and/or summaries and or minutes and/or notes mentioned above and state when and where counsel for the plaintiff may examine and copy these documents.

ANSWER: No.

36. State whether you have received any workmen's compensation claim for injury, occupational disease, or death, to any of your employees or to any persons working as independent contractor for you, or under your direction or to any persons in "contract units" operated by you or your subsidiaries or divisions or to any [illegible] hired on an occasional basis by your agents, employees or [illegible]ors, in the course of work activity performed by the aforementioned "contract unit" for the following diseases: asbestosis, emphysema, chronic bronchitis, pulomonary fibrosis dyspnea, carcinoma of the lungs, or mesothelioma. In answering this question confine your answer to workers who were occupationally exposed to asbestos products by their using, handling, fabricating, installing, removing, mixing, cutting, packing or transporting products containing any percentage whatsoever of asbestos whether raw or finished and whether made by you or made by some other company but used, handled, modified, installed, removed, mixed, cut, packed or transported by the perso or persons making the workmen's compensation claim for injury or occupational disease or death whether your employees or contract unit managers or contract unit occasional workers independently contracted for. If there have been any workman's compensation claims within the above-described criteria between the years 1930 and 1978, state:

(a) The date you received notice of the claim;
(b) The identity of the person making the claim; or on whose behalf the claim was made;
(c) The specific disease or illness complained of. In particular, all complaints of: asbestosis, emphysema, chronic bronchitis, pulmonary firosis, dyspnea, carcinoma of the lungs and mesothelioma;
(d) The name of any physician or nurse who made any notes on the claim or who inscribed any words whatsoever on any document, paper, letter, book, or record pertaining to the evaluation of the facts and/or the merits and/or the medical workup of the claim filed;
(e) A brief summary of the substance of the written materials mentioned in section (d);
(f) The present location(s) of the documents, medical or otherwise, relevant to the claim files, if any, specified in section (a);
(g) An index to the claim files, if any specified in section(a) showing how, if at all, they are broken down by the defendant in the ordinary course of the defendant's business activity (i.e. by geographical region, by plant, by profit center, by disease, by injury, by level of compensation demanded, by estimate on the eventual payments that will be required on the claim, by worker's name or number, by contract unit, by date, or in any other way that the defendant as a practical matter in the ordinary course of defendant's business actually breaks down and indexes the claims of the kind specified for purposes of defendant's own internal filing and record keeping.)
(h) The state or federal agency or agencies which would in the ordinary course of defendant's business and in the ordinary course of the state and federal gover[illegible]

(i) The indexing or filing system used by those agencies in the respective states or in the respective federal agencie
(j) The records retention policies concerning claims of the kinds specified in Part(a) of the defendant, and of [illegible] which the defendant has knowledge in [illegible] where the defendant does business, and to which the defendant supplies information concerning claims of this kind. Also include any federal agencies which would receive notice directly or in the defendant's knowledge indirectly as a matter of the ordinary business of the federal government concerning claims of the aforementioned kind;
(k) The disposition of said claim(s) including benefits paid or settlements reached or moneys voluntarily paid by your insurers, if any;
(l) The last known address of the attorney representing the Claimant, if any.

ANSWER: Not to the best of Defendant's present knowledge.

37. Have you ever been named as a party in any action for workmen's compensation benefits for injury, occupational disease, or death by any of your employees or their estates, or by any persons working as independent contractors for you or under your direction or their estates, or by any directors, managers, [illegible] involved as a casual labor or occasional worker independently contracted for basis in "contract units" operated by you or their estates where the disease, injury or death was asserted by the Plaintiff and/or claimant in the action to be based in whole or in part on the diseases; asbestosis, emphysema, chronic bronchitis, pulmonary fibrosis, dyspnea, carcinoma of the lungs, or mesothelioma and where the plaintiff and/or claimant in the course of his work experience used, handled, fabricated, installed removed, mixed, cut, packed or transported asbestos products containing any percentage whatsoever of asbestos? If so, state as to each claim:

(a) The identity of the Plaintiff and/or claimant and the disease(s) or injury(s) on which the action was premissed;
(b) The date is was filed;
(c) The name and address of the court, agency, or administrative body, in which it was filed;
(d) The term and/or number of the action;
(e) The identity of the claimant's attorney;
(f) the identity of the claimant's physician;
(g) The identity of your physician, and/or expert witnesses;
(h) The disposition of the action including any moneys paid voluntarily or by agreement or in settlement by you or by our insurance carrier.

ANSWER: Not to the best of Defendant's present knowledge.

[illegible] insurance carrier have ever paid out money voluntarily, or by agreement, or in settlement, on a claim for the following diseases; asbestosis, emphysema, chronic bronchitis, pulmonary fibrosis, dyspnea, carcinoma of the lungs, or mesothelio between the years 1930 and 1978, specify for each instance:

a) The amount paid out;
b) Who paid it;
c) Who received the payment;
d) The date of the payment(s);
(e) Whether, if it was an agreement, the agreement went on file with any court, agency, or administrative body, and if so, the date and location of the filing;
(f) The current location of any document(s) evidencing such voluntary payment, and the name, and address of their present custodian, and the time and place where counsel for plaintiff may examine and copy such document(s).

ANSWER: Not to the best of Defendant's present knowledge.

39. If you or your insurance carrier have ever paid out money, voluntarily, or by agreement, or in settlement to any employee contractor, contract unit worker, contract unit manager, or casual, or incidental laborer for a claim based on the following diseases; asbestosis, emphysema, chronic bronchitis, pulmonary fibrosis, dyspnea, carcinoma of the lungs, or mesothelioma, state as to each recipent of such funds:

(a) His or her identitiy;
(b) The identity of his or her attorney;
(c) The date the clain was made;
(d) The date payment commenced and the duration and anount(s) of payment(s);
(e) The insurance carrier making the payment;
(f) Whether such agreement was filed in any court; agency or administrative body, if so, state:
    a. The date it was filed;
    b. The location of such filing;
(g) The current location of any document(s) evidencing such

voluntary payment(s) and the name and address of their present custodian and the time and place where counsel for the plaintiff can examine and copy such document(s).

ANSWER: Not applicable.

40. State whether you or your insurance carrier has voluntarily or by agreement paid to any employee benefits for accident, sickness, health, disability, or retirement, by reason of exposure to asbesto products. If so, state as to each:

(a) The identity of such employee;
(b) The identity of the employee's attorney;
(c) The identity of the insurance carrier(s) making such payment;
(d) The dates the claims were made as to each separate claim by each employee;
(e) The date payment was made;
(f) The current location of any documents evidencing such payments, the name and address of their present custodian and the time and place where counsel for the plaintiff can examine and copy such documents.

ANSWER: Not to the best of Defendant's present knowledge.

RAILROAD FRICTION PRODUCTS CORP.

(Continued)

CARRIER	POLICY NO.	POLICY TERM	LIMITS OF LIABILITY
Hartford	10C661814	7/15/76 - 77	$500K CSL
Admiral	6CX0542	7/15/76 - 77	$500K XS $500K
N. Eastern	GL25964	7/15/76 - 77	
Admiral	7CM0432	7/15/77 - 78	$100K XS $1,900K S.I.
Prudential Re.	DXCDX0312	7/15/77 - 78	$1,000K XS $2,000K
Prudential Re.	DXCDX0336	8/10/77 - 7/15/78	$2,000K XS $3,000K
Lexington	5506135	8/10/77 - 7/15/78	
see attached		7/15/78 - 81	see attached

*-Denotes information subject to verification by carriers.

N/A-Not available at this time.

[illegible] your insurance carriers for workmen's compensation and occupational disease compensation from 1930 through 1978, and as to each insurance carrier, state the periods when such coverage was provided and the amount provid

ANSWER: See Exhibit II.

42. If you or your insurance carrier have ever paid out money as a result of a court decree or jury verdict against you in a case i which the plaintiff asserted injury resulting from exposure to asbestos products mixed, manufactured, produced, processed, compou converted, sold, merchandised, supplied, or placed in the stream o commerce identify the:

(a) Court in which judgement was entered against you.
(b) Court docket number.
(c) Plaintiff's name.
(d) Plaintiff's attorney's name and address
(e) Amount of judgement.
(f) Date judgement entered.
(g) Other defendants against whom judgement was entered.

ANSWER: None.

42(a) Do you have an insurance carrier in this action or are you self-insured? If you have a carrier, please state or attach.

(a) The amount of coverage in your policy.
(b) The deductible, if any.
(c) The provisions of the policy.
(d) The years for which the policy was purchased.
(e) The coverage limits and policy numbers of other insurance companies with which you have policies and the years covered.

ANSWER: See Exhibit III.

42(b) Please attach the latest statement of your assets, liabili current income, and net worth.

ANSWER: Defendant objects to this question as not leading to relevant testimony in the case at bar.

[illegible] department that performs occupational studies or reviews of worker's health? If so, describe:

(a) How long in existence.
(b) Names of those who have led that department since 1930.
(c) Any reports or warnings provided to you by that department [illegible] hazards of asbestos.
Current address of that person or those persons referred to in (b) Supra.

ANSWER: No.

44. Have you had a medical advisor or other professional reviewing your products particularly asbestos, and making recommendations for use? If so, please answer (a)-(d) of interrogatory 43.

ANSWER: Yes, occupational hygiene services are provided by Johns-Manville. See answer to Interrogatory No. 18 regarding test results.

manufacturer of asbestos products, please answer interrogatories 7, 18, 19, 20, 21, 22, 23, 26, 27, with respect to whether you ever received such information from the manufacturers or from the trade association and so indicate by date, place, and describe any documents.

ANSWER: Not applicable.

46(a) Do you contend that the Plaintiff or his employer were contributorily negligent?

ANSWER: To be determined upon further investigation and discovery.

46(b) Do you contend that the Plaintiff or his employer assumed the risk of his employment?

ANSWER: To be determined upon further investigation and discovery.

47. If the answer to interrogatory Number 46(a) or 46(b) is yes, please state in detail the factual basis for the contention and name any witnesses you intend to produce to support this contentic

ANSWER: See answer to Interrogatory No. 46.

48. If you are a manufacturer of products containing asbestos or were such at any time during the period 1940-1989 which would be used on railroads including but not limited to brake shoes, do you deny selling such products to the railroad yard at which Plaintiff was employed. If you do not deny that you did so during any period, please specify the products and the times sold and quantity sold.

ANSWER: Defendant has no information at this time that it sold products to Plaintiff's employer.

48(a) If you are a manufacturer of products containing asbestos which would be used on railroads, especially but not limited to brake shoes, but sold to distributors only, list all your distributors which might have sold to the railroad yard that employed Plaintiff during the period 1940-1980.

ANSWER: To the best of Defendant's present knowledge, listed below are the above-referenced distributors:

New York Air Brake Company and Walker Machine Company.

48(b) If you are a miner, only list the companies to whom you sold raw asbestos which would use asbestos to manufacture equipment for railroads including but not limited to brake shoes.

ANSWER: Not applicable.

49. Do you contend that the Plaintiff Victor Verrick misused the products sold to his employer, the B & O Railroad and/or Chessie System?

ANSWER: To be determined upon further investigation and discovery.

50. Did you or employees of your company ever attend meetings of the Asbestos Textile Institute or any of its committees? If yes,
(a) Identify the meetings and dates.
(b) Who attended from your company.
(c) What materials were dispensed.

ANSWER: No.

51. Identify all individuals who are now or have ever been employed by you including their current address who can testify or have testified concerning:
(a) The history of that portion of your organization responsible for preventive medicine or occupational hygiene.
(b) Your company medical pokicy, practices, and procedures.
(c) The history of that portion of your organization responsible for product safety.
(d) The nature and extent of your knowledge, over time, of health hazards actually, allegedly, or possibly associated with exposure to asbestos or asbestos product.
(e) Actions taken by you to warn, direct or indirect purchasers of asbestos products or protect their employees of health hazards.
(f) Actions taken to warn or protect persons such as Plaintiff and spouse against hazards of asbestos.

ANSWER: None to the best of Defendant's current information and belief.

52. If these employees have testified in depositions or trials with respect to the matters ennumerated in interrogatory 51, attach the relevant portions of their testimony and identify the court, docket number of the case and date of testimony.

ANSWER: None.

53. Did or does Defendant maintaim a medical library? If yes, state:
(a) Date established.
(b) Location.
(c) Names and addresses of librarians.
(d) Title, author, and publisher of all journals and books bought or subscribed to during the period 1930-1978.
(e) To whom journals in the area of asbestos, industrial hygiene, medicine, safety or engineering were distributed.

ANSWER: No.

54. Please set out the names and current addresses of any of your employees or former employees who have testified in law suits or Workmen's Compensation proceedings by railroad employees for injuries resulting from asbestos exposure.

ANSWER: None to the best of Defendant's current knowledge and belief.

55. Please identify the suits or proceedings in which they testified and attach copies of their testimony.

ANSWER: See Answer to Interrogatory No. 54.

Dated this 30th day of July, 1981.

CURRAN, MYLOTTE, DAVID &
FITZPATRICK

By: _____
EDWARD J. DAVID, ESQUIRE
Attorneys for Defendant
Railroad Friction Products
Corporation et al
1718 Locust Street
At Rittenhouse Square
Philadelphia, Pennsylvania 19103
(215) 732-5050

COMONWEALTH OF PENNSYLVANIA :

SS

COUNTY OF PHILADELPHIA :

EDWARD J. DAVID, ESQUIRE, being duly sworn according to law deposes and says that he is the attorney of record on behalf of Railroad Friction Products Corporation, that he takes the affidavit as he is authorized to do, that he has secured the information necessary to prepare the within Answer to Interrogatories from others, that he does not necessarily have personal knowledge of the facts stated but believes the same to be true and correct to the best of his knowledge, information and belief.

EDWARD J. DAVID, ESQUIRE

SWORN TO AND SUBSCRIBED :

before me this 18th day :

of August A.D. 1981 :

NOTARY PUBLIC

PATRICIA ANN ROMANO, NOTARY PUBLIC
PHILADELPHIA, PHILADELPHIA COUNTY
MY COMMISSION EXPIRES APR. 9, 1984
Member, Pennsylvania Association of Notaries

C O R P O R A T E R E C O R D S

* * * * * * * * * * * * * * *

RAILROAD FRICTION PRODUCTS CORPORATION

Organized under the laws of the
State of Delaware

December 13, 1954

Registered with

The Prentice-Hall Corporation System, Inc.
229 South State Street
Dover, Kent County, Delaware

CERTIFICATE OF INCORPORATION

OF

RAILROAD FRICTION PRODUCTS CORPORATION

We, the undersigned, for the purpose of associating to establish a corporation for the transaction of the business and the promotion and conduct of the objects and purposes hereinafter stated, under the provisions and subject to the requirements of the laws of the State of Delaware (particularly Chapter 1, Title 8 of the 1953 Delaware Code and the acts amendatory thereof and supplemental thereto, and known as the "General Corporation Law of the State of Delaware"), do make and file this Certificate of Incorporation in writing and do hereby certify as follows, to wit:

FIRST: The name of the corporation (hereinafter called the corporation) is

RAILROAD FRICTION PRODUCTS CORPORATION

SECOND: The respective names of the County and of the City within the County in which the principal office of the corporation is to be located in the State of Delaware are the County of Kent and the City of Dover. The name of the resident agent of the corporation is The Prentice-Hall Corporation System, Inc. The street and number of said principal office and the address by street and number of said resident agent is 229 South State Street, Dover, Delaware.

THIRD: The nature of the business of the corporation and the objects or purposes to be transacted, promoted or carried on by it are as follows:

To manufacture and sell friction braking elements for use by the railroad and railway industries.

To acquire by purchase, exchange, lease or otherwise and to own, hold, use, develop, operate, sell, assign, lease, transfer, convey, exchange, mortgage, pledge or otherwise dispose of or deal in and with, real and personal property of every class or description and rights and privileges therein wheresoever situate.

To manufacture, process, purchase, sell and generally to trade and deal in and with goods, wares and merchandise of every kind, nature and description, and to engage and participate in any mercantile, industrial or trading business of any kind or character whatsoever.

To apply for, register, obtain, purchase, lease, take licenses in respect of or otherwise acquire, and to hold, own, use, operate, develop, enjoy, turn to account, grant licenses and immunities in respect of, manufacture under and to introduce, sell, assign, mortgage, pledge or

otherwise dispose of, and, in any manner deal with and contract with reference to:

(a) inventions, devices, formulae, processes and any improvements and modifications thereof;

(b) letters patent, patent rights, patented processes, copyrights, designs, and similar rights, trade-marks, trade symbols and other indications of origin and ownership granted by or recognized under the laws of the United States of America or of any state or subdivision thereof, or of any foreign country or subdivision thereof, and all rights connected therewith or appertaining thereunto;

(c) franchises, licenses, grants and concessions.

To purchase or otherwise acquire, and to hold, mortgage, pledge, sell, exchange or otherwise dispose of, securities (which term, for the purpose of this Article THIRD, includes, without limitation of the generality thereof, any shares of stock, bonds, debentures, notes, mortgages, or other obligations, and any certificates, re-

ceipts or other instruments representing rights to receive, purchase or subscribe for the same, or representing any other rights or interests therein or in any property or assets), created or issued by any persons, firms, associations, corporations, or governments or subdivisions thereof; to make payment therefor in any lawful manner; and to exercise, as owner or holder of any securities, any and all rights, powers and privileges in respect thereof.

To make and enter into, perform and carry out contracts of every kind and description with any person, firm, association, corporation or government or subdivision thereof.

To acquire by purchase, exchange or otherwise, all, or any part of, or any interest in, the properties, assets, business and good will of any one or more persons, firms, associations or corporations heretofore or hereafter engaged in any business for which a corporation may now or hereafter be organized under the laws of the State of Delaware; to pay for the same in cash, property or its own or other securities; to hold, operate, reorganize, liquidate, sell or in any manner dispose of the whole or any part thereof;

and in connection therewith, to assume or guarantee performance of any liabilities, obligations or contracts of such persons, firms, associations or corporations, and to conduct the whole or any part of any business thus acquired.

To lend its uninvested funds from time to time to such extent, to such persons, firms, associations, corporations, governments or subdivisions thereof, and on such terms and on such security, if any, as the Board of Directors of the corporation may determine.

To endorse or guarantee the payment of principal, interest or dividends upon, and to guarantee the performance of sinking fund or other obligations of, any securities, and to guarantee in any way permitted by law the performance of any of the contracts or other undertakings in which the corporation may otherwise be or become interested, of any persons, firm, association, corporation, government or subdivision thereof, or of any other combination, organization or entity whatsoever.

To borrow money for any of the purposes of the corporation, from time to time, and without limit as to amount; from time to time to issue

and sell its own securities in such amounts, on such terms and conditions, for such purposes and for such prices, now or hereafter permitted by the laws of the State of Delaware and by this Certificate of Incorporation, as the Board of Directors of the corporation may determine; and to secure such securities by mortgage upon, or the pledge of, or the conveyance or assignment in trust of, the whole or any part of the properties, assets, business and good will of the corporation, then owned or thereafter acquired.

To draw, make, accept, endorse, discount, execute, and issue promissory notes, drafts, bills of exchange, warrants, bonds, debentures, and other negotiable or transferable instruments and evidences of indebtedness whether secured by mortgage or otherwise, as well as to secure the same by mortgage or otherwise, so far as may be permitted by the laws of the State of Delaware.

To purchase, hold, cancel, reissue, sell, exchange, transfer or otherwise deal in its own securities from time to time to such an extent and in such manner and upon such terms as the Board of Directors of the corporation shall determine; provided that the corporation shall not

use its funds or property for the purchase of its own shares of capital stock when such use would cause any impairment of its capital, except to the extent permitted by law; and provided further that shares of its own capital stock belonging to the corporation shall not be voted upon directly or indirectly.

To organize or cause to be organized under the laws of the State of Delaware, or of any other State of the United States of America, or of the District of Columbia, or of any territory, dependency, colony or possession of the United States of America, or of any foreign country, a corporation or corporations for the purpose of transacting, promoting or carrying on any or all of the objects or purposes for which the corporation is organized, and to dissolve, wind up, liquidate, merge or consolidate any such corporation or corporations or to cause the same to be dissolved, wound up, liquidated, merged or consolidated.

To conduct its business in any and all of its branches and maintain offices both within and without the State of Delaware, in any and all States of the United States of America, in

the District of Columbia, in any or all territories, dependencies, colonies or possessions of the United States of America, and in foreign countries.

To such extent as a corporation organized under the General Corporation Law of the State of Delaware may now or hereafter lawfully do, to do, either as principal or agent and either alone or in connection with other corporations, firms, or individuals, all and everything necessary, suitable, convenient or proper for, or in connection with, or incident to, the accomplishment of any of the purposes or the attainment of any one or more of the objects herein enumerated, or designed directly or indirectly to promote the interests of the corporation or to enhance the value of its properties; and in general to do any and all things and exercise any and all powers, rights and privileges which a corporation may now or hereafter be organized to do or to exercise under the General Corporation Law of the State of Delaware or under any act amendatory thereof, supplemental thereto or substituted therefor.

The foregoing provisions of this Article THIRD shall be construed both as purposes and powers and each as an independent purpose and power. The foregoing enumeration of specific purposes and powers shall not be held to limit or restrict in any manner the purposes and powers of the corporation, and the purposes and powers herein specified shall, except when otherwise provided in this Article THIRD, be in no wise limited or restricted by reference to, or inference from, the terms of any provision of this or any other Article of this Certificate of Incorporation; provided that nothing herein contained shall be construed as authorizing the corporation to issue bills, notes or other evidences of debt for circulation as money, or to carry on the business of receiving deposits of money or the business of buying gold or silver bullion or foreign coins or as authorizing the corporation to engage in the business of banking or insurance or to carry on the business of constructing, maintaining or operating public utilities in the State of Delaware; and provided, further, that the corporation shall not carry on any business or exercise any power in any state, territory, or country which under the laws thereof the corporation may not lawfully carry on or exercise.

FOURTH: The total number of shares of stock which the corporation shall have authority to issue is Two Thousand (2,000), and the par value of each of such shares shall be One

Hundred ($100.00) Dollars. All such shares are of one class and are designated as Common Stock.

FIFTH: The minimum amount of capital with which the corporation will commence business is One Thousand Dollars.

SIXTH: The names and places of residence of each of the incorporators are as follows:

NAME	PLACE OF RESIDENCE
L. R. Boland	Dover, Delaware
N. C. Dunning	Dover, Delaware
Z. A. Pool, III	Dover, Delaware

SEVENTH: The corporation is to have perpetual existence.

EIGHTH: The private property of the stockholders of the corporation shall not be subject to the payment of corporate debts to any extent whatever.

NINTH: For the management of the business and for the conduct of the affairs of the corporation, and in further definition, limitation and regulation of the powers of the corporation and of its directors and stockholders, it is further provided:

1. The number of directors of the corporation shall be as specified in the By-Laws of the corporation but such number may from time to time be increased or decreased in such manner as may

be prescribed by the By-Laws. In no event shall the number of directors be less than three. The election of directors need not be by ballot. Directors need not be stockholders.

2. In furtherance and not in limitation of the powers conferred by the laws of the State of Delaware, the Board of Directors is expressly authorized and empowered:

(a) By resolution adopted by a majority of the whole Board, to make, alter, amend, and repeal By-Laws, subject to the power of the stockholders to alter or repeal the By-Laws made by the Board of Directors.

(b) With the written assent or affirmative vote of a majority of the stockholders, to authorize and issue obligations of the corporation, secured or unsecured, to include therein such provisions as to redeemability, convertibility or otherwise, as the Board of Directors may determine, and to authorize the mortgaging or pledging, as security therefor, of any property of the corporation, real or personal, including after-acquired property.

(c) To determine whether any, and, if any, what part, of the net profits of the corporation or of its net assets in excess of its capital shall be declared in dividends and paid to the stockholders, and to direct and determine the use and disposition of any such net profits or such net assets in excess of capital.

(d) To fix from time to time the amount of profits of the corporation to be reserved as working capital or for any other lawful purpose.

(e) To establish bonus, profit-sharing or other types of incentive or compensation plans for the employees (including officers and directors) of the corporation and to fix the amount of profits to be distributed or shared and to determine the persons to participate in any such plans and the amounts of their respective participations.

In addition to the powers and authorities hereinbefore or by statute expressly conferred upon it, the Board of Directors may exercise all such powers and do all such acts and things as

may be exercised or done by the corporation, subject, nevertheless, to the provisions of the laws of the State of Delaware, of the Certificate of Incorporation and of the By-Laws of the corporation.

3. Any director or any officer elected or appointed by the stockholders or by the Board of Directors may be removed at any time in such manner as shall be provided in the By-Laws of the corporation.

4. No contract or other transaction between the corporation and any other corporation and no other act of the corporation shall, in the absence of fraud, in any way be affected or invalidated by the fact that any of the directors of the corporation are pecuniarily or otherwise interested in, or are directors or officers of, such other corporation. Any director of the corporation individually or any firm or association of which any director may be a member, may be a party to, or may be pecuniarily or otherwise interested in, any contract or transaction of the corporation, provided that the fact that he individually or such firm or association is so interested shall be disclosed or shall have been

known to the Board of Directors or a majority of such members thereof as shall be present at any meeting of the Board of Directors at which action upon any such contract or transaction shall be taken. Any director of the corporation who is also a director or officer of such other corporation or who is so interested may be counted in determining the existence of a quorum at any meeting of the Board of Directors which shall authorize any such contract or transaction, and may vote thereat to authorize any such contract or transaction, with like force and effect as if he were not such director or officer of such other corporation or not so interested. Any director of the corporation may vote upon any contract or other transaction between the corporation and any subsidiary or affiliated corporation without regard to the fact that he is also a director of such subsidiary or affiliated corporation.

Any contract, transaction or act of the corporation or of the directors, which shall be ratified by a majority of a quorum of the stockholders of the corporation at any annual meeting, or at any special meeting called for such purpose, shall, in so far as permitted by law or by the

Certificate of Incorporation of the corporation, be as valid and as binding as though ratified by every stockholder of the corporation; provided, however, that any failure of the stockholders to approve or ratify any such contract, transaction or act, when and if submitted, shall not be deemed in any way to invalidate the same or deprive the corporation, its directors, officers or employees, of its or their right to proceed with such contract, transaction or act.

5. Subject to any limitation in the By-Laws, the members of the Board of Directors shall be entitled to reasonable fees, salaries or other compensation for their services and to reimbursement for their expenses as such members. Nothing contained herein shall preclude any director form serving the corporation, or any subsidiary or affiliated corporation, in any other capacity and receiving proper compensation therefor.

6. If the By-Laws so provide, the stockholders and Board of Directors of the corporation shall have power to hold their meetings, to have an office or offices and to keep the books of the corporation, subject to the provisions of the laws of Delaware, outside of said State at such

place or places as may from time to time be designated by them.

TENTH: Whenever a compromise or arrangement is proposed between this corporation and its creditors or any class of them and/or between this corporation and its stockholders or any class of them, any court of equitable jurisdiction within the State of Delaware may, on the application in a summary way of this corporation or of any creditor or stockholder thereof, or on the application of any receiver or receivers appointed for this corporation under the provisions of Section 291 of Title 8 of the Delaware Code, or on the application of trustees in dissolution or of any receiver or receivers appointed for this corporation under the provisions of Section 279 of Title 8 of the Delaware Code, order a meeting of the creditors or class of creditors, and/or of the stockholders or class of stockholders of this corporation, as the case may be, to be summoned in such manner as the said court directs.

If a majority in number representing three-fourths in value of the creditors or class of creditors, and/or of the stockholders or class of stockholders of this corporation as the case may be, agree to any compromise or arrangement and to any reorganization of this corporation as a consequence of such compromise or arrangement, the said compromise or arrangement and the said reorganization shall, if sanctioned by the

court to which the said application has been made, be binding on all the creditors or class of creditors, and/or on all the stockholders or class of stockholders of this corporation, as the case may be, and also on this corporation.

ELEVENTH: The transfer of shares of any class of stock of this corporation may be restricted by agreement between the corporation and the holders of all the shares of such class of stock then outstanding and of the subscribers for all authorized shares for which subscriptions shall have then been accepted; in which event, so long as such agreement remains in effect, a reference to such restriction shall be stated on each of the certificates for such stock.

TWELFTH: From time to time any of the provisions of this Certificate of Incorporation may be amended, altered or repealed, and other provisions authorized by the laws of the State of Delaware at the time in force may be added or inserted in the manner and at the time prescribed by said laws, and all rights at any time conferred upon the stockholders of the corporation by this Certificate of Incorporation are granted subject to the provisions of this Article TWELFTH.

IN WITNESS WHEREOF, we, the undersigned, being all of the incorporators hereinabove named do hereby further certify that the facts hereinabove stated are truly set forth and accordingly have hereunto set our respective hands and seals.

Dated at Dover, Delaware

December 13, 1954

L. R. Boland (L.S.)

J. C. Dunning (L.S.)

[illegible] (L.S.)

STATE OF DELAWARE)
) SS.:
COUNTY OF KENT)

BE IT REMEMBERED that personally appeared before me, F. K. Tuller, a Notary Public in and for the County and State aforesaid, L. R. Boland, N. C. Dunning, and Z. A. Pool, III, all the incorporators who signed the foregoing Certificate of Incorporation, known to me personally to be such, and I having made known to them and each of them the contents of said Certificate of Incorporation, they did severally acknowledge the same to be the act and deed of the signers, respectively, and that the facts therein stated are truly set forth.

GIVEN under my hand and seal of office this 13th day of December, A. D. 1954.

F. K. Tuller
Notary Public

STATE OF DELAWARE

OFFICE OF SECRETARY OF STATE

I, John N. McDowell, Secretary of State of the State of Delaware, do hereby certify that the above and foregoing is a true and correct copy of Certificate of Incorporation of "RAILROAD FRICTION PRODUCTS CORPORATION" as received and filed in this office the thirteenth day of December, A. D. 1954, at 9 o'clock A. M.

SEAL

IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal, at Dover, this thirteenth day in the year of our Lord One Thousand Nine Hundred and Fifty-Four.

John N. McDowell
Secretary of State

Exhibit II

western union telegram

12/20/61-62	TRAVELERS UE 1513S2
12/20/62-63	TRAVELERS UR 591673
12/20/63-64	TRAVELERS UR 836773
12/20/64-65	TRAVELERS UR 6667636
12/20/65-66	TRAVELERS GE 2768532
12/20/66-67	TRAVELERS UR 2996114
12/20/67-68	TRAVELERS UR 3723991
12/20/69-70	TRAVELERS INDEMNITY COMPANY TUB 489 1296
12/20/70 - 6/1/71	TRAVELERS TUB 949583-70
6/1/71-72	TRAVELERS TUB 949583-71
6/1/72 - 4/1/73	TRAVELERS TUB 968 007-72
4/1/73 - 7/1/73	TRAVELERS TUB 184 T 002-1-73
7/1/73-74	LIBERTY MUTUAL WC1 621 004039 143
7/1/74-75	LIBERTY MUTUAL WC1 621 004039 144
7/1/75-76	LIBERTY MUTUAL WC1 621 004039 145

RAILROAD FRICTION PRODUCTS CORP.

CARRIER	POLICY NO.	POLICY TERM	LIMITS OF LIABILITY
USF & G	CGL 109349	12/31/54-55	$500K/$1,000/$1,000K*
USF & G	N/A	12/31/54-56	$500K/$1,000/$1,000K*
USF & G	N/A	12/31/56-57	$500K/$1,000/$1,000K*
USF & G	N/A	12/31/57-58	$500K/$1,000/$1,000K*
USF & G	N/A	12/31/58-59	$500K/$1,000/$1,000K*
USF & G	N/A	12/31/59-60	$500K/$1,000/$1,000K*
USF & G	N/A	12/31/60-61	$500K/$1,000/$1,000K*
Travelers	SLG9940524	12/31/61-62	$500K/$1,000/$1,000K*
Travelers	SLG513978	12/31/62-63	$500K/$1,000/$1,000K*
Travelers	KSLG1162252	12/31/63-64	$500K/$1,000/$1,000K*
Travelers	KSLG1906151	12/31/64-65	$500K/$1,000/$1,000K*
Travelers	KSLG2519193	12/31/65-66	$500K/$1,000/$1,000K*
Travelers	NSL2998436	12/31/66-67	$500K/$1,000/$1,000K*
Travelers	NSL4028968	12/31/67-68	$500K/$1,000/$1,000K*
Travelers	NSL4031900	12/31/68-69	$500K/$1,000/$1,000K*
Travelers	TNSL4891297	12/31/69-70	$500K/$1,000/$1,000K*
Travelers	TNSL949582-70	12/31/70 - 8/1/71	$500K/$1,000/$1,000K*
Travelers	TNSL949582-71*	8/1/71 - 72*	$500K/$1,000/$1,000K*
Travelers	TNSL968006-72	8/1/72 - 4/1/73	$500K/$1,000/$1,000K*
Travelers	TNSL103T508-4-73	4-1-73 - 74	$1,000K CSL
Travelers	TNSL103T508-4-74*	4-1-74 - 75*	$1,000K CSL*
Travelers	TNSL103T508-4-75	4-1-74-7-15-76	$1,000K CSL
Travelers	TCUP134T809-A-75	4-1-74-7-15-76	$10,000K XS $1,000K