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McCore, Rode, Clifford, Wolfe & Larson

1 McCUTCHEN, DOYLE, BROWN & ENERSEN
 2 WILLIAM H. ARMSTRONG
 3 WARREN E. GEORGE
 4 STUART C. WALKER
 5 Three Embarcadero Center
 6 San Francisco, California 94111
 7 Telephone: (415) 393-2000

8 Attorneys for Defendant
 9 GAF Corporation

10 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

12 ESMAN P. VELASQUEZ,

13 Plaintiff,

14 v.

15 FIBREBOARD PAPER PRODUCTS
 16 CORPORATION, et al.,

17 Defendants.

No. 681-172

RESPONSES TO PLAINTIFF'S
 SECOND SET OF INTERROGATORIES
 TO DEFENDANTS

18 Defendant, GAF CORPORATION, ("GAF") responds to
 19 plaintiff's second set of interrogatories as follows:

20 INTERROGATORY NO. 1:

21 Did you ever at any time give instructions to
 22 workers who would use or apply the insulation products
 23 manufactured or distributed by your company of the correct
 24 and safe method of applying your insulation? If so, describe
 25 such instructions, to whom they were given, and the dates they
 26 were given.

1 ANSWER:

2 See GAF's Answer to Interrogatories B(3)(c) and (d)
3 of plaintiff's first set of interrogatories filed April 24,
4 1975 in Velasquez v. Fibreboard, et al., No. 681-172 (hereinafter
5 "plaintiff's first interrogatories - Velasquez").

6 INTERROGATORY NO. 2:

7 What studies have you made to determine the effect
8 of your products containing asbestos on the lungs and physical
9 condition of persons employed as insulators and asbestos
10 workers who use your products?

11 ANSWER:

12 None.

13 INTERROGATORY NO. 3:

14 Please state who made such studies and when were they
15 made. Attach copies of the reports of such studies. In answer-
16 ing this question, fully describe any studies made beginning
17 with the year 1940 to the date of your answers.

18 ANSWER:

19 See Answer to Interrogatory No. 2.

20 INTERROGATORY NO. 4:

21 Did you package, sell or distribute any products con-
22 taining asbestos from the years 1940 to the present date? If so
23 how were the products sold, packaged and distributed. Were
24 these products universally used through the United States?

25 ANSWER:

26 See GAF's response to Interrogatories B(2) and

1 B(3)(a) of plaintiff's first interrogatories - Velasquez as
2 well as the letters of Stuart C. Walker to J. Kenneth Lynch
3 dated December 5, 1975 and February 4, 1976. GAF objects to
4 the final sentence of Interrogatory No. 4 on the ground that the
5 information requested is not relevant to the subject matter of
6 this action nor reasonably calculated to lead to the discovery
7 of admissible evidence. Further, GAF objects to the use of the
8 term "universally" as being so vague and ambiguous that GAF
9 cannot frame a meaningful response thereto.

10 INTERROGATORY NO. 5:

11 If these products were used primarily in any specific
12 location or area, please explain where such products were pri-
13 marily used.

14 ANSWER:

15 GAF objects to this interrogatory on the grounds that
16 the information requested is not relevant to the subject mat-
17 ter of this action nor reasonably calculated to lead to the
18 discovery of admissible evidence. See, however, answer to
19 Interrogatory No. 4, above, and letter of February 4, 1976,
20 from Stuart C. Walker to J. Kenneth Lynch supplementing GAF's
21 answers to plaintiff's first interrogatories - Velasquez.

22 INTERROGATORY NO. 6:

23 Do you recognize that prolonged use of the insulating
24 materials containing asbestos manufactured or distributed by

25 ///

26 ///

1 you can cause or contribute to cause various occupational
2 diseases, including asbestosis, silicosis, dermatitis and
3 mesothelioma?

4 ANSWER:

5 GAF objects to this interrogatory on the ground
6 that it is argumentative, improperly calls for expert opinion,
7 and that the terms "recognize" and "prolonged use" are so
8 vague and ambiguous that GAF cannot frame a meaningful response
9 to the interrogatory. See, however, GAF's Answer to Inter-
10 rogatory B(3)(c) of plaintiff's first interrogatories - Velasquez.

11 INTERROGATORY NO. 7:

12 Has your company done any studies or has your company
13 conducted any studies concerning the effects of inhalation of
14 asbestos dust or fibers by one using or being exposed to any of
15 the asbestos materials manufactured or distributed by your
16 company? In answer to this question, please give the date and
17 nature of your studies, if any; the name or names of the persons
18 conducting the studies and their address; what the purpose of
19 the studies were; and attach a copy of any report based upon
20 such studies, showing to whom such report was given and when.

21 ANSWER:

22 See Answers to Interrogatories 2 and 3, above.

23 INTERROGATORY NO. 8:

24 Have you or any of your employees ever conducted
25 studies designed to minimize or eliminate the inhalation
26 of asbestos dust and fibers by those exposed to your company's

1 products during installation or tearing out thereof? If so,
2 give the name or names of such persons conducting such studies,
3 attach copies of such studies, by whom they were made, and to
4 whom they were given, and when, and state what action, if any,
5 was taken based upon such studies in an effort to minimize or
6 eliminate the effects of inhalation of asbestos dust or fibers
7 upon those using or being exposed to the dust and fibers
8 contained in such products as manufactured or distributed by
9 your company.

10 ANSWER:

11 See Answers to Interrogatories 2 and 3, above.

12 INTERROGATORY NO. 9:

13 Do you or your company have any regular inspection of
14 areas where workers are applying or installing products manufac-
15 tured by your company containing asbestos as to the dust count?
16 If you do not, then please explain why this is not done; and if
17 you do, please explain what action, if any, is taken by your
18 company following the taking of dust counts at any of the loca-
19 tions referred to above. Please give the dates, if any, that
20 your company first started making dust counts.

21 ANSWER:

22 GAF does not presently manufacture thermal industrial
23 insulation products containing asbestos fibers. See answer
24 to interrogatory H of plaintiff's first interrogatories - Velasquez.
25 The letter of February 4, 1976 from Stuart C. Walker to J. Kenneth
26 Lynch, supplementing GAF's answers to plaintiff's first inter-

1 rogatories - Velasquez indicates that GAF has not sold insulation
2 products containing asbestos to distributors or jobbers in
3 California during the period of time relevant to this action.
4 Accordingly, GAF had no access to job sites or job site
5 workers and no control over job site conditions known only to,
6 and capable of being affected only by, insulation contractors,
7 their employers, or unions. Any actions required properly to
8 prepare, use and apply insulation materials and to ensure a
9 proper working environment for individuals necessarily exposed
10 to asbestos containing products in the course of their
11 employment was thus within the sole control and responsibility
12 of such contractors, their employees or unions.

13 GAF objects to this interrogatory insofar as it seeks
14 information regarding GAF's inspection procedures with respect
15 to GAF products other than thermal industrial insulation
16 materials containing asbestos on the ground that such information
17 is not relevant to the subject matter of this action nor
18 reasonably calculated to lead to the discovery of admissible evi-
19 dence.

20 INTERROGATORY NO. 10:

21 Do you agree that once asbestos fibers or dust are in-
22 haled into the lungs, there is no way to eliminate all such dust
23 or fibers from the lungs for the balance of such person's life?

24 ANSWER:

25 GAF objects to this interrogatory on the grounds that
26 it is argumentative, improperly calls for expert opinion, and

1 that medical evidence on this point is equally available to
2 plaintiff.

3 INTERROGATORY NO. 11:

4 What technique, if any, does your company use to make
5 dust samplings. Please explain each technique and when it was
6 commenced; what the purpose was; and what action has been taken
7 in response to the findings as to the dust samples.

8 ANSWER:

9 Not applicable. See GAF's objection to Interrogatory
10 No. 9 regarding GAF products other than thermal industrial insu-
11 lation materials containing asbestos.

12 INTERROGATORY NO. 12:

13 Does your company recognize that asbestos causes
14 asbestos-induced lung cancer? If your answer is "yes," when
15 did you come to such realization and what action did you take
16 in response thereto? If your answer is "no," then please
17 explain why no studies were made by your company to ascertain
18 that this fact was indeed true and thereafter to take action
19 to advise those exposed to your products of their dangerous
20 nature.

21 ANSWER:

22 GAF objects to this interrogatory on the ground
23 that the use of the word "causes," standing alone, is so
24 vague and ambiguous that it cannot frame a meaningful
25 response thereto. Moreover, the interrogatory is argumentative,
26 improperly calls for expert opinion, and medical evidence

1 regarding the point raised is equally available to plaintiff.
2 See, however, GAF's Answer to Interrogatory B(3)(c)(3) and (5)
3 of plaintiff's first interrogatories - Velasquez.

4 INTERROGATORY NO. 13:

5 Does your company recognize there is a direct connec-
6 tion between the inhalation of asbestos dust and fibers and
7 the disease mesothelioma? If your answer is "yes," to this
8 question, then please advise what notices were given to those
9 exposed to your asbestos products of this fact.

10 ANSWER:

11 GAF objects to this interrogatory on the ground
12 that it is argumentative, improperly calls for expert opinion,
13 and that medical evidence regarding this point is equally
14 available to plaintiff. Moreover, the use of the term "direct
15 connection" is so vague and ambiguous that GAF cannot frame a
16 meaningful response to the interrogatory. See, however, GAF's
17 Answer to Interrogatory B(3)(c)(1) through (5) of plaintiff's
18 first set of interrogatories - Velasquez.

19 INTERROGATORY NO. 14;

20 Do you agree that asbestos has been directly
21 associated medically with the disease of cor pulmonale?

22 ANSWER:

23 GAF objects to this interrogatory for the reasons
24 set forth in Answer to Interrogatories 12 and 13 above.
25 The term "directly associated" is too vague and ambiguous
26 for GAF to be able to frame a meaningful response to the

1 interrogatory.

2 INTERROGATORY NO. 15:

3 Has your company consulted with Dr. Irving J.
4 Selikoff, of New York, New York, concerning asbestosis, or
5 other asbestos-related diseases? If so, please state when
6 and under what circumstances and what information, if any,
7 was furnished by your company, giving dates, to him.

8 ANSWER:

9 GAF objects to this interrogatory on the grounds that
10 the word "consulted" is so vague and ambiguous that GAF cannot
11 frame a meaningful response thereto.

12 INTERROGATORY NO. 16:

13 Does your company recognize that Dr. Selikoff is one
14 of the world's foremost authorities on asbestosis and
15 mesothelioma?

16 ANSWER:

17 Defendant GAF objects to this interrogatory on the
18 ground that it is argumentative, not relevant to the subject
19 matter of this action, nor reasonably calculated to lead to
20 the discovery of admissible evidence.

21

22 INTERROGATORY NO. 17:

23 Has your company previously, or does your company now,
24 contribute any funds to research concerning asbestos and its
25 relation to lung and other diseases of the body? If so, please
26 state the amount of money contributed, when and to whom, attaching

1 any report or reports from such individual or organization to
2 whom your funds were contributed.

3 ANSWER:

4 GAF has made no direct contributions of funds to re-
5 search concerning asbestos and its purported relation to lung and
6 other diseases of the body.

7 INTERROGATORY NO. 18:

8 Do you have any labor inspectors or anyone from
9 your company whose job it is to go to areas where your products
10 are being used to make a dust level count? If so, please state
11 when your company started such procedure, the purpose of it,
12 and what action, if any, was taken in response to your findings.

13 ANSWER:

14 Not applicable. GAF does not presently manufacture
15 industrial insulation products containing asbestos fibers.

16 INTERROGATORY NO. 19:

17 Is your company familiar with the hearings conducted
18 in March 1967 before the House of Representatives of the United
19 States Congress Subcommittee on Labor? If so, did any repre-
20 sentative of your company participate in such hearings? If so,
21 state the name and address of your company representative.

22 ANSWER:

23 No.

24 INTERROGATORY NO. 20:

25 Do you have a copy of the transcript of such hearing?
26 If so, will you make a copy thereof available for plaintiff's

1 inspection and copying without an order?

2 ANSWER:

3 No.

4 INTERROGATORY NO. 21:

5 Is it possible to distinguish your insulation products
6 containing asbestos from those manufactured or distributed by a
7 competitor when such product has been removed from its container?
8 If your answer is "yes," please describe how you contend your
9 products in all instances can be distinguished from that of a
10 competitor. If there are products which cannot be distinguished,
11 in your opinion, from products of a similar kind manufactured
12 by a competitor, please state the name of such product, who manu-
13 factures or distributes it, as well as the product manufactured
14 by your competitor.

15 ANSWER:

16 Yes, by comparing, among other things, the form and/
17 or substance and/or appearance of GAF products to those of
18 other products.

19 INTERROGATORY NO. 22:

20 Is it true that most of the products manufactured
21 or distributed by your company containing asbestos were intended
22 by you in most instances to be cut, sawed, scribed, shaped, or
23 mixed by the ultimate user and his employees, in the application
24 or installation of these products?

25 ANSWER:

26 No.

1 INTERROGATORY NO. 23:

2 Please give the state of incorporation of your
3 company, the date it was organized, and the domicile of your
4 company at this time. State the name and address of the president
5 of your company.

6 ANSWER:

7 The Ruberoid Co. was incorporated in New York in 1886
8 under the name The Standard Paint Company. After several corpo-
9 rate changes, The Standard Paint Company was incorporated in New
10 Jersey in 1905. The Standard Paint Company became The Ruberoid
11 Co. on March 10, 1921. After 1966 the executive offices of The
12 Ruberoid Co. were located at 733 Third Avenue, New York, New
13 York.

14 GAF was incorporated in Delaware in 1929 as the
15 American I.G. Chemical Corporation. Its name was changed in
16 1939 to General Aniline & Film Corporation and again in 1968 to
17 GAF Corporation.

18 GAF's principal place of business is 140 West 51st
19 Street, New York, New York 10020. Its president is Dr. Jesse
20 Werner.

21 INTERROGATORY NO. 24:

22 How many years has your company been engaged in the
23 manufacture of products containing asbestos?

24 ANSWER:

25 Pursuant to Agreement dated March 23, 1967, GAF merged
26 with The Ruberoid Co. The Ruberoid Co. began the manufacture of

1 thermal industrial insulation products containing asbestos in
2 the 1930's. GAF ceased the manufacture of such products in
3 1972.

4 INTERROGATORY NO. 25:

5 If your company contends that any respirator or
6 other breathing device is currently on the market ~~that~~ will
7 prevent the inhalation of asbestos dust and fibers, give the
8 detailed description of such respirator or other breathing
9 device, together with how you know this will prevent the
10 inhalation of such dust and fibers, what tests were conducted,
11 by whom and where, with sufficient detail to enable us to
12 obtain the results of such tests.

13 ANSWER:

14 GAF ceased the manufacture of thermal industrial insu-
15 lation products containing asbestos in 1972. GAF makes no con-
16 tentions as described in this interrogatory, but GAF does know
17 that certain "breathing devices" are "currently on the market."

18 INTERROGATORY NO. 26:

19 If you have answered Interrogatory No. 25 that there
20 is a respirator or other breathing device currently on the market
21 that will prevent the inhalation of asbestos dust and fibers,
22 then state what date or approximately what date such device was
23 placed on the market.

24 ANSWER:

25 Unknown.

26 ///

1 INTERROGATORY NO. 27:

2 Prior to the date such device was placed on the
3 market, was there a respirator or other breathing device on
4 the market to prevent the inhalation of asbestos dust and fibers?
5 If so, give the description of such device, together with how
6 you know it prevented the inhalation of dust and fibers, what
7 tests were conducted, by whom and where, with sufficient detail
8 to enable plaintiffs to obtain the results of such tests.

9 ANSWER:

10 Unknown.

11 INTERROGATORY NO. 28:

12 Is it true that your company has manufactured or
13 distributed insulating materials containing asbestos for many
14 years, and that such products have been placed upon the open
15 market to be purchased and used by the public?

16 ANSWER:

17 See GAF's Answer to Interrogatories 4, 5,
18 and 24. GAF objects to so much of the interrogatory as
19 refers to "open market" and "the public" on the grounds
20 that said terms are vague and ambiguous and GAF cannot
21 frame a meaningful response thereto.

22 INTERROGATORY NO. 29:

23 Has your company ever recognized the fact that
24 after your products have been purchased from you that they
25 will ultimately be used and applied by a worker in the field
26 such as an insulator and asbestos worker?

1 ANSWER:

2 Yes.

3 INTERROGATORY NO. 30:

4 Does your company recognize that insulating materials
5 containing asbestos are dangerous and harmful to human beings
6 and to the health of man? If your answer to this question is
7 "yes," then please explain when you came to this conclusion and
8 what, if anything, you have done about it to notify the public.
9 If your answer is that your products are not harmful, then explain
10 what tests were made by you upon which you base such conclusion.

11 ANSWER:

12 GAF objects to this interrogatory on the grounds
13 set forth in Answer to Interrogatories 12 and 13 above.
14 See, however, GAF's answer to interrogatory B of plaintiff's
15 first interrogatories - Velasquez.

16 INTERROGATORY NO. 31:

17 Please state whether or not your company has knowledge
18 of any deaths of lung disease among your employees which has been
19 attributed to asbestos dust or fibers. If so, please give the
20 number, the names of the employees, the address of such employees,
21 together with the name and address of the doctor who administered
22 treatment to such employee, if known.

23 ANSWER:

24 See GAF's answer to interrogatory F of plaintiff's
25 first interrogatories - Velasquez, as supplemented by the
26 letter of Stuart C. Walker to J. Kenneth Lynch, dated December

1 5, 1975.

2 INTERROGATORY NO. 32:

3 If your company previously manufactured or distributed
4 any insulation containing asbestos commonly used by insulators,
5 or does so now, please describe how the following products were,
6 or are, cut, shaped, mixed, and applied on the jobs:

7 (a) Asbestos cement

8 (b) Asbestos pipe covering

9 (c) Asbestos bricks or blocks

10 (d) Asbestos sheeting

11 (e) Asbestos rope or cloth

12 (f) Asbestos insulation in loose form which may be
13 blown into homes or buildings

14 (g) Asbestos in spray form.

15 In answering this question, give particular reference as to
16 whether or not the materials were to be sawed or cut on the
17 job, blown into confined areas, or mixed with water in a
18 cement or paste. State whether or not there is any way known
19 to you that the above products can be used and applied without
20 the worker inhaling any of the dust or fibers, giving the date
21 that you first knew of such method you have described, and
22 how it is done.

23 ANSWER:

24 GAF's products were supplied in a ready-to-use form.
25 However, where on-site fitting was required, the following pro-
26 cedures were necessary:

- 1 1) Calsilite: required cutting only where dimensions
2 so dictated.
- 3 2) 7M Cement and 6D Cement: required mixing with
4 water. In addition, a small amount of ordinary
5 building cement was added at the user's option.
- 6 3) TN/A 100: required cutting only where dimensions
7 so dictated.
- 8 4) Asbestos paper and millboard: required cutting
9 only where dimensions so dictated.

10 GAF has no direct knowledge regarding how its products were used
11 at job sites. See also, GAF's Answer to Interrogatory No. 9 above.

12 INTERROGATORY NO. 33:

13 Do you have any statistical figures available showing
14 the number of your employees who are exposed to asbestos dust and
15 fibers in their employment, and who have worked for your company
16 10 years or longer and who have lung disease? If so, please
17 give such figures.

18 ANSWER:

19 No.

20 INTERROGATORY NO. 34:

21 Do you have any medical information or information
22 of your own knowledge concerning the most common cause of death
23 of one having asbestosis? If so, describe what the most frequent
24 cause of death from one suffering from such disease is.

25 ANSWER:

26 GAF objects to this interrogatory on the grounds that

1 it is so vague and ambiguous that GAF cannot frame a meaningful
2 response thereto. Moreover, the interrogatory is argumentative,
3 improperly calls for expert opinion, and information relating to
4 the point raised is equally available to plaintiff.

5 INTERROGATORY NO. 35:

6 State the net profits made by your company for each of
7 the years since and including the year 1960.

8 INTERROGATORY NO. 36:

9 State the net worth of your company as of the end of
10 your annual accounting period for each of the years since 1960.

11 INTERROGATORY NO. 37:

12 Give the total volume of sales of products manufactured
13 or distributed by your company and include, if possible, the total
14 amount of sales of products of your company containing asbestos
15 for each of the years since 1960.

16 ANSWERS TO INTERROGATORIES NOS. 35, 36 AND 37:

17 GAF will make available to plaintiff's attorneys for
18 their inspection and copying at plaintiff's expense copies of its
19 Financial Statements for the period 1967 to present as they appeared
20 in GAF's published Annual Reports. GAF will also produce for
21 plaintiff's inspection and copying at plaintiff's expense the
22 Financial Statements of The Ruberoid Co. as they appeared in its
23 published Annual Reports for the years 1960 through 1966.

24 INTERROGATORY NO. 38:

25 Has your company ever devised a high temperature
26 heat insulation which does not contain asbestos? If so, state

1 the date that such insulation was first placed on the market
2 and whether or not you have eliminated your insulation products
3 containing asbestos.

4 ANSWER:

5 Yes. See letter of December 5, 1975 from Stuart C.
6 Walker to J. Kenneth Lynch, supplementing GAF's answer to
7 interrogatory H of plaintiff's first interrogatories - Velasquez.
8 See also GAF's answer to interrogatory H of plaintiff's first
9 interrogatories - Velasquez.

10 INTERROGATORY NO. 39:

11 State what prompted your company to devise such high
12 temperature heat insulation not containing asbestos.

13 ANSWER:

14 GAF followed its competition in improving and updating
15 its insulation products.

16 INTERROGATORY NO. 40:

17 Has such high temperature heat insulation not con-
18 taining asbestos performed satisfactorily, that is, is such
19 insulation suitable for the purpose for which it is used?

20 ANSWER:

21 Such product did perform satisfactorily.

22 INTERROGATORY NO. 41:

23 Does your company know of any other company which has
24 devised a high temperature heat insulation which does not con-
25 tain asbestos? If so, state the name of the company and the
26 trade name of such insulation.

1 ANSWER:

2 GAF believes that most, if not all, major insulation
3 manufacturers have developed high temperature insulation, not
4 containing asbestos. GAF, however, has no first hand knowledge
5 regarding any manufacturer or its specific insulating products.

6 INTERROGATORY NO. 42:

7 Since devising a high temperature heat insulation
8 which does not contain asbestos, if you have done so, state
9 whether or not you have continued to manufacture or distribute
10 insulation containing asbestos.

11 ANSWER:

12 See GAF's Answer to Interrogatory No. 38.

13 INTERROGATORY NO. 43:

14 If you have devised a high temperature heat insula-
15 tion which does not contain asbestos, please list the trade
16 name or names of such insulation, and state fully what such
17 insulation contains.

18 ANSWER:

19 "Calsilite II". See also, GAF's Answer to Interrogatory
20 No. 38. GAF no longer manufactures asbestos-free Calsilite.

21 INTERROGATORY NO. 44:

22 If your company has devised a high temperature
23 heat insulation which does not contain asbestos, state whether
24 or not your sales of asbestos insulation have decreased. If
25 your sales have decreased, please state in dollars the amount
26 of such decrease for each year since you began manufacturing

1 insulation which does not contain asbestos.

2 ANSWER:

3 GAF no longer manufactures thermal insulation products
4 containing asbestos.

5 INTERROGATORY NO. 45:

6 Have you ever been requested by contractors to
7 devise a high temperature heat insulation not containing
8 asbestos? If so, please give the dates of such requests and
9 by whom they were made.

10 ANSWER:

11 No, not to GAF's best recollection.

12 INTERROGATORY NO. 46:

13 Has your company ever been advised of threshold limit
14 values for exposure to asbestos dust recommended by the American
15 Conference of Governmental Industrial Hygienists? If so, state
16 the year that you were first advised or made aware of such
17 threshold limit values. Will you voluntarily make available
18 copies thereof for plaintiff's inspection and copying?

19 ANSWER:

20 Yes. This defendant does not have a specific recol-
21 lection concerning the date on which it first became aware of
22 threshold limit values recommended by the American Conference
23 of Governmental and Industrial Hygienists. This defendant
24 has always endeavored to operate within the special limits
25 thus recommended. The recommendations of the American Con-
26 ference of Governmental and Industrial Hygienists are a matter

1 of public record and equally available to plaintiff.

2 INTERROGATORY NO. 47:

3 What was the threshold limit values for exposure to
4 asbestos dust which was recommended by the American Conference
5 of Governmental Industrial Hygienists when you were first
6 advised of such threshold limit values?

7 ANSWER:

8 The first value GAF is able to recall was 5,000,000
9 particles per cubic foot (5MPPCF).

10 INTERROGATORY NO. 48:

11 Have you been made aware of any changes in the
12 threshold limit values for exposure to asbestos dust recommen-
13 ded by the American Conference of Governmental Industrial
14 Hygienists in the last five years? If so, please state what
15 changes, if any, have been made in such threshold limit values,
16 and when you were first advised of such changes.

17 ANSWER:

18 Yes. In 1968 the American Conference of Governmental
19 Industrial Hygienists proposed that the threshold limit value be
20 changed to 12 fibers greater than 5 microns in length per milli-
21 liter or 2,000,000 particles per cubic foot (2MPPCF), and in 1970
22 proposed that the threshold limit value be changed to 5 fibers
23 greater than 5 micrometers in length per milliliter.

24 INTERROGATORY NO. 49:

25 Has your company, either directly, or indirectly,
26 through any trade associations, ever advised any contractor

1 to whom you sell, or have sold, your products containing as-
2 bestos of threshold limit values for exposure to asbestos
3 dust recommend by the American Conference of Governmental
4 Industrial Hygienists? If so, state the date or dates that
5 you so advised such contractors and the manner in which you
6 advised such contractors.

7 ANSWER:

8 GAF belongs to the Asbestos Information Association/
9 North America, Inc. ("AIA"). As it is believed that the main
10 function of the AIA is to publish material and literature which
11 is then forwarded or otherwise transmitted to contractors, GAF
12 has indirectly advised contractors of such threshold limit values.
13 See also GAF's Answer to Interrogatories Nos. 1 and 9 above.

14 INTERROGATORY NO. 50:

15 Do you agree that various states of the United States
16 have enacted Workers' Compensation Laws covering employees who
17 contract an occupational disease in their employment?

18 ANSWER:

19 GAF objects to this interrogatory on the grounds
20 that it is argumentative, calls for information that is a
21 matter of public record, is not relevant to the subject matter
22 of this action nor reasonably calculated to lead to discovery
23 of admissible evidence, and is so vague and ambiguous that
24 GAF cannot frame a meaningful response thereto.

25 INTERROGATORY NO. 51:

26 Do you agree that one or more states of the United

1 States have enacted such Workers' Compensation Laws covering
2 employees who contract an occupational disease as early as
3 the year 1913?

4 ANSWER:

5 GAF objects to this interrogatory for the reasons
6 set forth in its Answer to Interrogatory No. 50.

7 INTERROGATORY NO. 52:

8 Do you agree that one or more states of the United
9 States have enacted such Workers' Compensation Laws covering
10 employees who contract an occupational disease as early as
11 the year 1917?

12 ANSWER:

13 GAF objects to this interrogatory for the reasons
14 set forth in its Answer to Interrogatory No. 50.

15 INTERROGATORY NO. 53:

16 Do you agree that one or more states of the United
17 States have enacted such Workers' Compensation Laws covering
18 employees who contract an occupational disease as early as
19 the year 1920?

20 ANSWER:

21 GAF objects to this interrogatory for the reasons
22 set forth in its Answer to Interrogatory No. 50.

23 INTERROGATORY NO. 54:

24 Do you agree that one or more states of the United
25 States have enacted such Workers' Compensation Laws covering
26 employees who contract an occupational disease as early as

1 the year 1930?

2 ANSWER:

3 GAF objects to this interrogatory for the reasons
4 set forth in its Answer to Interrogatory No. 50.

5 INTERROGATORY NO. 55:

6 Do you agree that asbestosis is an occupational
7 disease?

8 ANSWER:

9 GAF objects to this interrogatory on the grounds
10 that it is argumentative, improperly calls for expert opinion,
11 and that the information sought is not relevant to the subject
12 matter of this action nor reasonably calculated to lead to
13 discovery of admissible evidence. Moreover, the interrogatory
14 is so vague and ambiguous that GAF cannot frame a meaningful
15 response thereto.

16 INTERROGATORY NO. 56:

17 Do you have copies of your current sales literature
18 for your insulation products available? If so, will you
19 furnish plaintiff copies of such sales literature for inspec-
20 tion and copying?

21 ANSWER:

22 No. GAF does not presently manufacture insulation
23 products containing asbestos.

24 INTERROGATORY NO. 57:

25 Do you have copies of your sales literature for your
26 insulation products containing asbestos for the years 1950,

1 1955, 1960, 1965, 1970 available? If so, will you furnish
2 plaintiff copies of such sales literature for inspection and
3 copying?

4 ANSWER:

5 GAF will make available to plaintiff's counsel for
6 inspection and copying whatever sales literature for its
7 insulation products containing asbestos that it can locate in
8 its files for the years indicated.

9 INTERROGATORY NO. 58:

10 Does your company have, or has it ever had, a Research
11 Department? If so, give the name and address of each head of
12 such department, give the year that such Research Department
13 was established and whether or not such Research Department has
14 operated continuously since being established.

15 ANSWER:

16 During the period from 1967 through the present, the
17 following persons at GAF have held the position Vice-President
18 Research:

19 GAF

20	<u>Name</u>	<u>Date of Service</u>	<u>Present Employer</u>
21			
22	Dr. Leon Katz	-1967	American Can
23	Dr. Frederick Grosser	1967-1969	GAF
24	Dr. Robert Meyers	1969-1972	Regal Paper
25	Dr. Simon Kantor	1972-Present	GAF

26 ///

1 The directors of the research department at The
2 Ruberoid Co. were as follows:

3	<u>Name</u>	<u>Date of Service</u>	<u>Present Employer</u>
4			
5	Edward Duke	?-1947	Retired; address unknown
6	Clarence Eckert	1947-1958	Deceased
7	Philip S. Bettoli	1958-1967	GAF

8 GAF does not recall the date when it initially es-
9 tablished a Research Department.

10 INTERROGATORY NO. 59:

11 Please state in detail the duties and responsibilities
12 of such Research Department.

13 ANSWER:

14 Principally, new product research and development.

15 INTERROGATORY NO. 60:

16 Does your company have, or has it ever had, a Medical
17 Department? If so, give the name and address of each head of
18 such department, give the year that such Medical Department was
19 established and whether or not such Medical Department has
20 operated continuously since being established.

21 ANSWER:

22 No.

23 INTERROGATORY NO. 61:

24 State in detail the duties and responsibilities of
25 such Medical Department.

26 ///

1 ANSWER:

2 Not applicable.

3 INTERROGATORY NO. 62:

4 Does your company employ any person or persons as
5 a "librarian" or keeper of articles, books, transcripts, reports,
6 medical literature, past or current, advertising materials, or
7 other documents relating to health hazards of various insula-
8 tion products? If so, please state: (a) the name and resi-
9 dence address of each person so employed; (b) the date such
10 "library" or collection of documents was commenced; (c) the
11 location of each such "library" or collection; (d) a general
12 description of contents of the "library" or collection.

13 ANSWER:

14 No.

15 INTERROGATORY NO. 63:

16 Does your company have copies of the books, articles,
17 reports, transcripts, or literature described in Exhibit "A"
18 attached hereto? If so, will you voluntarily make copies there-
19 of available to plaintiff for inspection and copying?

20 ANSWER:

21 GAF believes that it has some but not all of the items
22 listed in Exhibit "A". A detailed inventory is not possible
23 because this literature, if in GAF's possession, custody or con-
24 trol, would be located in diverse geographic locations, and then,
25 in several, if not more, offices in each such location. In any
26 event, GAF does receive whatever information is disseminated by

1 the AIA and will, if so requested, make inquiry to determine what
2 items were sent to it by the AIA during the period of GAF's
3 membership.

4 INTERROGATORY NO. 64:

5 To what trade associations concerning insulation
6 and building products has your company belonged to? Please
7 state the full name and address of each such association, and
8 the period or periods of your company's belonging?

9 ANSWER:

10 GAF has belonged to the following trade associations re-
11 lated to insulation materials containing asbestos:

12 Asbestos Information Association/North American
13 Suite 914
14 1660 L Street N.W.
Washington, D.C. 20036

15 National Insulation Manufacturers Association, Inc.
16 441 Lexington Avenue
New York, N.Y. 10017

17 Asbestos Cement Product Association
(believed defunct)

18 American Society of Testing Materials
19 Race Street, Philadelphia, Pennsylvania

20 INTERROGATORY NO. 65:

21 Has your company or its employees participated in
22 the writing or publication by such association written or filmed
23 information concerning insulation products? If so, please state:
24 (a) the names and residence addresses of your employees so in-
25 volved; and (b) the titles and dates of such writings or films.
26 Will you make such writings or films available to plaintiff for

1 inspection and copying?

2 ANSWER:

3 No.

4 INTERROGATORY NO. 66:

5 Will you stipulate that this set of Interrogatories
6 and your answers thereto may be utilized in the following
7 civil actions as though fully asked and answered in said
8 actions without the necessity of submitting the same set of
9 Interrogatories to you in said actions and without the neces-
10 sity of your reanswering said Interrogatories in each of
11 said actions?

- 12 (a) Judson G. Fleming v. Fibreboard, et al.,
13 Action No. 710-899
- 14 (b) Maurice Kendall v. Fibreboard, et al.,
15 Action No. 697-762
- 16 (c) Opal Morrison, Ad administrator of the Estate
17 of Elwyn J. Morrison, deceased v. Fibreboard,
18 et al., Action No. 701-446
- 19 (d) Joe P. Sandoval v. Fibreboard, et al., Action
20 No. 689-959
- 21 (e) Neal Speer v. Fibreboard, et al., Action
22 No. 695-157
- 23 (f) Sherman S. Stewart v. Fibreboard, et al.,
24 Action No. 695-921
- 25 (g) Mary J. Thompson, As administrator of the
26 Estate of Clarence Ewing Thompson, deceased
v. Fibreboard, et al., Action 698-870
- 27 (h) Robert Wadley v. Fibreboard, et al., Action
No. 697-762.

28 ///

29 ///

1 ANSWER:

2 Yes.

3 DATED: January 24, 1977.

4 McCUTCHEN, DOYLE, BROWN & ENERSEN

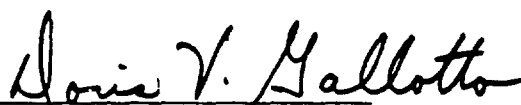
5
6 By STUART C. WALKER
7 Attorneys for Defendant
8 GAF Corporation
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1 STATE OF NEW YORK)
2) ss:
3 COUNTY OF NEW YORK)

4 JONATHAN BERGER, being duly sworn according to law,
5 deposes and says that he is Assistant Secretary of defendant
6 GAF Corporation; that he is duly authorized to make this affi-
7 davit on behalf of said corporation; and that all of the state-
8 ments set forth in the foregoing Responses to Plaintiff's Second
9 Set of Interrogatories are true and correct to the best of his
10 knowledge, information and belief.

11
12 
13 Jonathan Berger

14 Sworn to and subscribed
15 before me this 17th day
16 of January, 1977.

17 
18 Notary Public
19
20
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26

1. Jack Woodward and Ed Koch of Johns-Manville visited them.
- D. Johns-Manville supplied them with fiber off and on.
 1. Difficulty with infiltration problems.
- E. Bought from:
 1. Cassiar
 2. Lake Asbestos Company
 3. Asbestos Corporation

V. **GAF**

- A. Acquired Rubberoid in 1963 - fiber product manufacturer.
- B. 1958-1962 Ken McDonald was vice president of purchasing - Hendry did not discuss housekeeping with him.
 1. Hendry would give McDonald technical information.
- C. President during 1960's was Tim O'Leary.
 1. He discussed health hazards with Clint Burnett, Johns-Manville president,
- D. Joe Hall was in charge of asbestos mine in Vermont in 1950's.
 1. In 1960's was vice president.
 2. Asked Hendry many questions regarding asbestos, environment, and equipment.
 3. Knew more than others in Rubberoid organization regarding asbestos hazards.
- E. From 1968 to the present, Don Partridge of Johns-Manville called on GAF plants in St. Louis and Kansas City.
 1. He passed on information regarding health hazards with asbestos.
 2. Hendry also visited GAF plants.

VI. **H. K. Porter**

- A. Owned and operated prior to 1975 by Pacific Asbestos in Calaveras County, California.
- B. In 1975, H. K. Porter sold to U.S./German interests.
- C. Charlotte, North Carolina textile plant was very clean.

11

ASBESTOSIS CASES IN WHICH GAF WAS A DEFENDANT
AS OF JANUARY 11, 1977

Ahern vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3463

Albert vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
case No. 680

Allore vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-76-447

Antholz vs. Fibreboard Paper Products, et al
United States District Court for District of Minnesota -
Fifth Division
Case No. 5-70 Civ. 105
Status: dismissed

Armstrong vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 1057

Ballinger vs. Combustion Engineering, Inc., et al
Circuit Court, Division I, Knox Co., Knoxville, Tennessee
Case No. 1-684-75

Barrett vs. Johns-Manville Products Corporation, et al
Circuit Court of Missouri, Sixteenth Judicial Circuit
Case No. 784937
Status: dismissed

Baumann vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California in and for the
City and County of San Francisco
Case No. 688-553

Baumgartner vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-75-1057

Bednarczyk vs. Armstrong Cork Company, et al
Circuit Court of Cook County, Illinois
Case No. 76 L-5285

Bell vs. Fibreboard Paper Products Corp., et al
United States District Court for Eastern District of Texas
Case No. B-74-CA-50
Status: settled

Bellot vs. Fibreboard Corp., et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. B-74-253-CA
Status: settled

Bender vs. Armstrong Cork Company, et al
United States District Court for the Southern District of Florida,
Miami Division
Case No. 75-2578

Bilotta vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 412, 413

Birkner vs. GAF Corporation, et al
Circuit Court of the City of St. Louis, State of Missouri
Case No. 57711 F

Borel vs. Fibreboard Paper Products Corporation, et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. 6449
Status: Judgment affirmed on appeal

Breedlove vs. Combustion Engineering, Inc., et al
United States District Court - Northern District of Ohio -
Eastern Division
Case No. C-74-1130

Broussard vs. Fibreboard Paper Products Corporation, et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. B-73-CA-300
Status: settled

Brown vs. Combustion Engineering, Inc., et al
United States District Court, District of South Carolina, Charleston
Division
Case No. 76-1162

Bugyis vs. Johns-Manville Products Corp. et al
Circuit Court of Cook County, Illinois
Case No. 76 L 2164

Bunn vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3455

Bura vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 684

Burke vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio
- Eastern Division
Case No. C73-239

Burke vs. Standard Asbestos Manufacturing and Insulating Company, et al
United States District Court for the Southern District of Texas -
Houston Division
Case No. 75-H-870

Buscaino vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California in and for the City
and County of San Francisco
Case No. 694-631
Status: settled

Byerly vs. Standard Asbestos Manufacturing and Insulating Company, et al
United States District Court for the Southern District of Texas -
Houston Division
Case No. 75-H-866

Canino vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 924

Carr vs. Combustion Engineering, Inc., et al
U.S. District Court, East. Dist. of Michigan, South Division
Case No. 572332

Carter vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 413

Cathcart vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 923

Chaddock vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-75-102

Ciseck vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4022

Coleman vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3459

Condray vs. Fibreboard Corporation, et al
United States District Court, Eastern District of Texas, Beaumont Division
Case No. B-76-108-CA

Conte vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 686

Corea vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 1056

Corkran vs. Fibreboard Paper Products Corporation, et al
United States District Court, Eastern District of Texas, Beaumont Division
Case No. B-76-128-CA

Crawford vs. Fibreboard Corporation, et al
Court of Common Pleas of Philadelphia County
Case No. 4016

Crawford vs. Fibreboard Paper Products Corporation, et al
United States District Court for the Eastern District of Texas
Beaumont Division
Case No. 6492
Status: settled

Cunningham vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 412, 413

Curtin vs. Johns-Manville Products Corporation, et al
Circuit Court of the Third Judicial Circuit, Madison County
Case No. 75-L-146
Status: dismissed

Daniels vs. Combustion Engineering, Inc., et al
State of Tennessee, Circuit Court of Knox County, Division I
Case No. 1-492-75

DeChristopher vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 1749

Dellamo vs. Keene Corporation, et al
Court of Common Pleas of Philadelphia County
Case No. 100

Dickey vs. Standard Asbestos Manufacturing and Insulating Company, et al
United States District Court for the Southern District of Texas,
Houston Division
Case No. 75-H-864

Dolce vs. Fibreboard Paper Products Corporation, et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. B-75-191-CA

Dunbar vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 412, 413

Duncan vs. Combustion Engineering, Inc., et al
United States District Court for the District of South Carolina,
Charleston Division
Case No. 76-1249

Dunn vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3452

Dunn vs. Johns-Manville International Corporation, et al
United States District Court for the Southern District of Texas -
Houston Division
Case No. 73-H-1072

Estepp vs. Combustion Engineering, et al
State of Tennessee, Circuit Court of Knox County
Case No. 2-474-75

Farrar vs. Standard Asbestos Manufacturing & Insulating Co., et al
United States District Court for the Southern District of Texas,
Houston Division
Case No. 75-H-862

Featherstone vs. Johns-Manville Sales Corporation, et al
United States District Court, Eastern District of Texas - Beaumont
Division
Case No. B-76-167-CA
Status: settled

Ferris vs. Keene Corporation, et al
Court of Common Pleas of Philadelphia County
Case No.

Jones, Wilson W. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Long, James T. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Overman, Percy C. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Patrick, O. W. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Reynolds, Hugh V. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Roland, John Lee vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Sawyer, Thomas R. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Stacey, Milton L. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Van Dyke, Robert L. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Watson, Homer E. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

White, John W. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

White, Walter J. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Turley vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of
Georgia, Gainesville Division
Case No. C76-108 G

Bailey, Esther vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-155-NN

Grimes vs. Owens-Corning Fiberglas Corporation, et al
United States District Court, Southern District of Texas,
Houston Division
Case No. 76-H-1936

Small vs. Johns-Manville International Corp., et al
United States District Court, Southern District of Texas,
Houston Division
Case No. 76-H-1907

Walker vs. Johns-Manville Corporation, et al
Circuit Court of the City of Newport News
Case No. 2959-G

Mosher vs. Johns-Manville Products Corporation, et al
Circuit Court for the County of Wayne
Case No. 76-614243

Shoup vs. Johns-Manville Products Corporation, et al
Circuit Court for the County of Wayne
Case No. 76-606-823

Caines, Dorothy (Executrix) vs. Combustion Engineering, Inc., et al
Court of Common Pleas, County of Barnwell, South Carolina
Case No.

Drinkard, Harriet vs. Combustion Engineering, Inc., et al
United States District Court, Northern District of Ohio,
Eastern Division
Case No. C76-1318

Cash, Ronald M. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Ellis, Donahue vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Gibbons, Willie A. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Hogge, Thomas J. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Holloway, Maurice W. vs. Johns-Manville Corporation, et al
United States District Court for the Eastern District of
Virginia, Newport News Division
Case No. 76-178-NN

Foster vs. Fibreboard Paper Products Corporation, et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. B-74-204-CA
Status: settled

Freeman vs. Standard Asbestos Manufacturing and Insulating Company,
et al
United States District Court for the Southern District of Texas -
Houston Division
Case No. 75-H-869

Frith vs. Johns-Manville Products Corporation, et al
United States District Court for the Western District of Louisiana -
Shreveport Division
Case No. 73-H-1072

Gaspard vs. Standard Asbestos Manufacturing and Insulating Company, et al
United States District Court for the Southern District of Texas -
Houston Division
Case No. 75-H-868

Gaus vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4020

Gerace vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 3930

Gibson vs. Johns-Manville Products Corporation, et al
District Court in and for the County of Boulder, Colorado
Case No. 74-12-6-2
Status: settled

Grecco vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4017

Greene vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3458

Gustafson vs. Fibreboard Paper Products Corporation, et al
United States District Court for the Fifth Division - District of
Minnesota
Case No. 5-71-40
Status: dismissed

Hainsworth vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4024

Hallinan vs. Combustion Engineering, Inc., et al
United States District Court for the Southern District of Indiana -
Evansville Division
Case No. 75-25-C
Status: settled

Hamilton vs. Johns-Manville Products Corporation, et al
In the Circuit Court of Jackson County, Missouri at Kansas City
Case No. 784,986
Status: dismissed

Hammond vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 922

Hanna vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4023

Harter vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio,
Eastern Division
Case No. C-75-452

Hartwell vs. Johns-Manville Products Corporation, et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. 7513
Status: settled

Heinsdorf vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 1755

Holton vs. Standard Asbestos Manufacturing & Insulating Co., et al
United States District Court for the Southern District of Texas -
Houston Division
Case No. 75-H-1635

Howard vs. Owens-Corning Fiberglass Corporation, et al
United States District Court for the Eastern District of Texas -
Sherman Division
Case No. S-75-58-CA
Status: dismissed

Hughes vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3451

Huthmacher vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3457

Hutson vs. Armstrong Cork Company, et al
United States District Court for the Southern District of Florida,
Miami Division
Case No. 76-53-Civ-CA

Jacomino vs. Johns-Manville Corporation, et al
Court of Common Pleas, Philadelphia County
Case No. 1507

Jeane vs. Fibreboard Corporation, et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. B-74-337-CA

Johnson vs. Fibreboard Paper Products Corporation, et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. B-74-124-CA
Status: settled

Joyce vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4019

Joyner vs. Armstrong Cork Company, et al
United States District Court for the Southern District of Florida,
Miami Division
Case No. 75-2581

Karjala vs. Fibreboard Paper Products Corporation, et al
United States District Court for the District of Minnesota - Fifth
Division
Case No. 5-71-18
Status: dismissed

Kearns vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C73-70

Kendall vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California in and for the City and
County of San Francisco
Case No. 704-023

Kirchner vs. Standard Asbestos Manufacturing & Insulating Co., et al
Case No. 75-H-863

Kyburz vs. Standard Asbestos Manufacturing and Insulating Company,
et al
United States District Court for the Southern District of Texas -
Houston Division
Case No. 75-H-863

LaGrappe vs. Fibreboard Corporation, et al
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. B-74-66-CA
Status: settled

Landre vs. Johns-Manville Sales Corporation, et al
Superior Court of California, County of Alameda
Case No. 449876-8

Laurie vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 681

Leava vs. Johns-Manville Products Corp., et al
The Circuit Court of Jackson County, Missouri at Kansas City
Case No. CB75-4160

Lewis vs. GAF Corporation, et al
Court of Common Pleas, Philadelphia County
Case No. 12969

Lombardo vs. Keene Industrial Insulation, et al.
County of Philadelphia, Court of Common Pleas
Case No. 3448

Lopez vs. Armstrong Cork Company, et al.
United States District Court for the Southern District of Florida -
Miami Division
Case No. 75-1365 CIV-JLK

Lucera vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No 683

Luker vs. Johns-Manville International Corporation, et al.
United States District Court for the Southern District of Texas -
Houston Division
Case No. 75-H-342

Lyons vs. G. & W. Corson Inc., et al.
Court of Common Pleas of Delaware County, Pennsylvania
Case No. 75-6065

McAndrew vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No. 2192

McClain vs. G. & W. H. Corson Inc., et al.
Court of Common Pleas of Delaware County, Pennsylvania
Case No. 75-6065

McCoy vs. Fibreboard Paper Products, et al.
Circuit Court of Jackson County, Missouri at Kansas City
Case No. CV76-1377 Civil E

McDaniel vs. Johns-Manville Products Corporation, et al.
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. 6967
Status: settled

McGinnis vs. Combustion Engineering, Inc., et al.
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-74-1077

McGlinn vs. G. & W. H. Corson Inc., et al.
Court of Common Pleas of Delaware County, Pennsylvania
Case No. 75-6065

McGovern vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No. 1752

McGurk vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No. 1748

McKee vs. Johns-Manville Corporation, et al.
State of New York Supreme Court, County of Erie
Case No.

McKimmie vs. Combustion Engineering, et al.
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-76-180

McLaughlin vs. Combustion Engineering, Inc., et al.
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-75-377

McLaughlin vs. Combustion Engineering, Inc., et al.
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-74-923

McNeeley vs. Combustion Engineering, Inc., et al.
United States District Court for the Northern District of Ohio -
Eastern Division

McPoyle vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No. 4021

Macaluso vs. Keene Industrial Insulation, et al.
County of Philadelphia, Court of Common Pleas
Case No. 3462

Mackinson vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No. 1747

Matthews vs. Fibreboard Paper Products Corporation, et al.
United States District Court for the Eastern District of Texas -
Beaumont Division
Case NO. B-73-CA-309
Status: settled

Measor vs. Combustion Engineering, Inc., et al.
United States District Court for the Northern District of Ohio -
Eastern Division
Case Nol C73-238

Mellot vs. Johns-Manville Products Corporation, et al.
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-75-1058

Missanelli vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No. 1751

Mitchell vs. United Asbestos Corporation, et al.
State of Illinois - Circuit Court of the Third Judicial Circuit -
Madison County
Case No. 74-L-676

Moran vs. G. & W. Corson Inc., et al.
Court of Common Pleas of Delaware County, Pennsylvania
Case No. 1699

Morris vs. Johns-Manville Products Corporation, et al.
District Court in and for the County of Boulder, State of Colorado
Case No. 76-1504-1
Status: settled

Morrison vs. Fibreboard Paper Products Corporation, et al.
Superior Court of the State of California in and for the City and
County of San Francisco
Case No. 701 446

Muntean vs. Combustion Engineering, Inc., et al.
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C73-199

Murphy vs. Combustion Engineering, Inc., et al.
United States District Court for the Northern District of Ohio -
Eastern Division
Case No. C-75-453

Nave vs. Combustion Engineering, Inc., et al.
State of Tennessee, Circuit Court of Knox County, Division III
Case No. 3-491-75

Navo vs. Keene Industrial Insulation, et al.
County of Philadelphia, Court of Common Pleas
Case No. 3461

Nolan vs. Johns-Manville Asbestos & Magnesia Materials Company, et al.
Circuit Court of Cook County, Illinois
Case No. 75 L 8672

Overstreet vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No. 412,413

Palermo vs. Fibreboard Paper Products Corporation, et al.
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. B-75-192-CA

Pappalardo vs. Keene Industrial Insulation, et al.
County of Philadelphia, Court of Common Pleas
Case No. 3454

Phelps vs. Combustion Engineering, et al.
United States District Court for the Eastern District of Illinois
Case No. 76-4-012

Plitt vs. Standard Asbestos Manufacturing and Insulating Company,
et al.
United States District Court for the Southern District of Texas -
Houston Division
Case No. 75-H-906

Poore vs. G. & W. H. Corson Inc., et al.
Court of Common Pleas of Delaware County, Pennsylvania
Case No. 75-6065

Potter vs. Fibreboard Paper Products Corporation, et al.
United States District Court for the Eastern District of Texas -
Beaumont Division
Case No. 6329
Status: settled

Pvles vs. Keene Industrial Insulation, et al.
Court of Common Pleas of Philadelphia County
Case No. 1058

Quattelbaum vs. Combustion Engineering, Inc., et al.
United States District Court for the District of South Carolina,
Charleston Division
Case No. 76-1239

Rabinowitz vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 677

Reinhardt vs. Johns-Manville Products Corporation, et al
Circuit Court, Wayne County, Michigan
Case No. 76-614893

Rendall vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3450

Ricci vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio - Eastern Division
Case No. C72-507

Richards vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 1753

Roderman vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio - Eastern Division
Case No. C72-390

Romano vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 921

Rosenquest vs. GAF, et al
United States District Court, Southern District of Texas - Houston Division
Case No. 76-H-115

Roswurm vs. Philip Carey Manufacturing Corporation, et al
Circuit Court of Jackson County, Missouri
Case No. CV76-2631

Rudio vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3456

Russo vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4026

Samohod vs. G. & W. H. Corson Inc., et al
Court of Common Pleas of Delaware County, Pennsylvania
Case No. 76-6065

Sandoval vs. Fibreboard Paper Products Corporation, et al
Superior Court of California, County of San Francisco
Case No. 689-959

Sedlock vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio - Eastern Division
Case No. C72-395

Scavicchio vs. G. & W. H. Corson Inc., et al
Court of Common Pleas of Delaware County, Pennsylvania
Case No. 75-6065

Shaw vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3453

Simmler vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 685

Snell vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3460

Speer vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California in and for the City and County of
San Francisco
Case No. 695-157

Spell vs. Fibreboard Paper Products Corporation, et al
United States District Court for the Eastern District of Texas - Beaumont Division
Case No. E-71-81-CA
Status: Settled

Starnes vs. GAF, et al
United States District Court for the Northern District of Ohio - Eastern Division
Case No. C-76-46

Starnes vs. Combustion Engineering, Inc., et al
United States District Court for the Eastern District of Tennessee
Case No. CIV-2-75-122

Steele vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio - Eastern Division
Case No. C-75-359

Stewart vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California in and for the City and County of
San Francisco
Case No. 695-921

Strickland vs. Johns-Manville International Corporation, et al
United States District Court for the Southern Division of Texas - Houston Division
Case No. 75-H-492

Strickland vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California in and for the City and County of
San Francisco
Case No. 677-527

Sutcliffe vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4015

Talarico vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 1055

Talbot vs. Fibreboard Paper Products Corporation, et al
United States District Court, Eastern District of Texas - Beaumont Division
Case No. B-75-391-CA

Tannenbaum vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 678

Taylor vs. Combustion Engineering, Inc., et al
United States District Court for the District of South Carolina - Charleston Division
Case No. 76-1208

Taylor vs. Combustion Engineering, Inc., et al
United States District Court for the District of South Carolina - Charleston Division
Case No. 76-1241

Thompson vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California in and for the City and County of
San Francisco
Case No. 698-870

Tillman vs. G. & W. H. Corson Inc., et al
Court of Common Pleas of Delaware County, Pennsylvania
Case No. 75-6065

Trahan vs. Standard Asbestos Manufacturing and Insulating Company, et al
United States District Court for the Southern District of Texas - Houston Division
Case No. 75-H-905

Treadway vs. Combustion Engineering, Inc., et al
Circuit Court, Division 1, Knox County, Knoxville, Tennessee
Case No. 1-528-75

Tricoski vs. Keene Industrial Insulation, et al
County of Philadelphia, Court of Common Pleas
Case No. 3449

Turci vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 2191

Tyler vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 2193

Valiska vs. Johns-Manville Products Corporation, et al
Circuit Court of Cook County, Illinois
Case No. 76 L 2913

Velasquez vs. Fibreboard Paper Products Corporation, et al
Superior Court of California, County of San Francisco
Case No. 681-172

Viator vs. Standard Asbestos Manufacturing and Insulating Company, et al
United States District Court for the Southern District of Texas - Houston Division
Case No. 75-H-867

Vice vs. Fibreboard Corporation, et al
United States District Court for the Eastern District of Texas - Beaumont Division
Case No. B-76-115-CA

Wadley vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California in and for the City and County of
San Francisco
Case No. 697-762

Walters vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4018

Warrington vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 679

Watts vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 4025

Walker vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 1750

Wesberry vs. Standard Asbestos Manufacturing and Insulating Company, et al
United States District Court for the Southern District of Texas - Houston Division
Case No. 75-H-865

White vs. Combustion Engineering, Inc., et al
Circuit Court for Knox County, Tennessee
Case No. 3-672-75

Wiater vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 1754

Wimberly vs. Fibreboard Corporation, et al
United States District Court for the Eastern District of Texas - Beaumont Division
Case No. B-74-224-CA
Status: settled

Woods vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 682

Zeldin vs. Keene Industrial Insulation, et al
Court of Common Pleas of Philadelphia County
Case No. 920

Gause vs. Combustion Engineering, Inc., et al
Greenville County Court of Common Pleas, Greenville, South Carolina
Case No.

Thornton vs. Johns-Manville Corporation, et al
Circuit Court of the City of Portsmouth, Virginia
Case No. L-76-590

Demarest vs. Johns-Manville Sales Corporation, et al
Circuit Court, Wayne County, Michigan
Case No. 76-626429-NP

Dugger vs. Combustion Engineering, Inc., et al
Circuit Court for Knox County, Tennessee
Case No. 3-442-76

Nave, Bruce Alfred vs. Combustion Engineering, Inc., et al
Circuit Court for Knox County, Tennessee
Case No. 2-443-76

Adams vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Greenville County, S. C.
Case No.

Adams, Pauline vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Greenville County, South Carolina
Case No.

Hatfield vs. Combustion Engineering, Inc., et al
Circuit Court, Knox County, Knoxville, Tennessee
Case No. 2-453-76

Rogers vs. Combustion Engineering, Inc., et al
Circuit Court, Knox County, Knoxville, Tennessee
Case No. 1-456-76

Smith vs. Johns-Manville Corporation, et al
Circuit Court of the City of Portsmouth, Virginia
Case No. L-76-658

Starnes, Billy Joe vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio, Eastern Division
Case No. C-76-882

Fleming vs. Fibreboard Paper Products Corporation, et al
Superior Court of California, City and County of San Francisco
Case No. 710-899

Grice vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of Ohio, Eastern Division
Case No. C-76-883

Simson vs. Owens Corning Fiberglas Corporation, et al
U. S. District Court, Southern District of Texas, Houston Division
Case No. 76-H-1499

Bartholomew vs. Combustion Engineering, Inc., et al
Court of Common Pleas, County of Greenville, South Carolina
Case No.

Bolten vs. Philip Carey Manufacturing, et al
Circuit Court of Jackson County, Missouri
Case No. CV76-3764

Burgardner vs. Combustion Engineering, Inc., et al
Court of Common Pleas, County of Greenville, South Carolina
Case No.

Beath vs. Combustion Engineering, Inc., et al
Court of Common Pleas, County of Greenville, S. C.
Case No.

Kidd vs. Combustion Engineering, Inc., et al
Court of Common Pleas, County of Greenville, S. C.
Case No.

Koontz vs. Combustion Engineering, Inc., et al
Court of Common Pleas, County of Greenville, S. C.
Case No.

Glover vs. Johns-Manville Corporation, et al
Circuit Court of the City of Portsmouth, Virginia
Case No. L-76-747

Lauderback vs. Johns-Manville Sales Corporation, et al
United States District Court for the Eastern District of Texas, Marshall Division
Case No. M-76-69-CA

Barnett vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Greenville County, S. C.
Case No.

Davis vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Greenville, S. C.
Case No.

Murray vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Charleston County, S. C.
Case No.

Smith vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Aiken County, S. C.
Case No.

Turner vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Greenville County, S. C.
Case No.

Evelyn White vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Greenville, S. C.
Case No.

John E. White vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Greenville County, S.C.
Case No.

Ward vs. Johns-Manville Products Corporation, et al
U.S. District Court for the Eastern District of Texas,
Marshall Division
Case No. M-76-73-CA

Sterken vs. Owens-Corning Fiberglas Corporation, et al
United States District Court, Southern District of Texas,
Galveston Division
Case No. 76-G-111

Bouchelle vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Aiken County, S. C.
Case No.

Norris vs. Combustion Engineering, Inc., et al
United States District Court for the District of South Carolina,
Charleston Division
Case No. 76-1901

Bazemore vs. Johns-Manville Corporation, et al
Circuit Court of the City of Portsmouth, Virginia
Case No. L-76-883

Bouchelle vs. Combustion Engineering, Inc., et al
Court of Common Pleas for Aiken County, S. C.
Case No.

Call vs. Combustion Engineering, Inc., et al
Court of Common Pleas for the County of Charleston, S. C.
Case No.

Fearn vs. Forty-Eight Insulation, Inc., et al
Court of Common Pleas of Allegheny County, Pennsylvania
Case No. GD76-23408

Hershman vs. Johns-Manville Corporation, et al
Circuit Court of the City of Norfolk, Virginia
Case No. L76-1706

Johnson, Mary E. vs. GAF Corporation
Superior Court of New Jersey, Law Division, Hudson County
Case No.

Marzolf vs. Johns-Manville Corporation, et al
State of New York Supreme Court, County of Erie
Case No.

Oman vs. Johns-Manville Corporation, et al
Circuit Court of the City of Newport News
Case No. 2930-S

Sedlock, Joseph E. vs. Combustion Engineering, Inc., et al
United States District Court for the Northern District of
Ohio, Eastern Division
Case No. C-76-1098

Stewart, Evelyn vs. Fibreboard Paper Products Corporation, et al
Superior Court of the State of California for the City and
County of San Francisco
Case No. 713-284