

DONOVAN, ROSE, NESTER & SZEWCZYK, P.C.

ATTORNEYS AT LAW  
6 EAST WASHINGTON STREET  
BELLEVILLE, ILLINOIS  
62220-2190

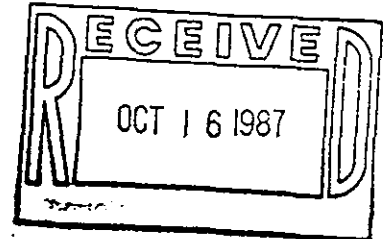
MAROLC A. DONOVAN  
DENNIS E. ROSE  
MICHAEL J. NESTER  
EDWARD G. SZEWCZYK  
CLARK D. SMITH  
STEVEN G. BAILEY  
DAVID A. NESTER  
CHARLES L. JOLLY

AREA CODE 618  
TELEPHONE  
235-2020

VINCENT J. HATCH  
OF COUNSEL

October 14, 1987

Hon. Willard V. Portell  
Clerk of the Circuit Courts  
Madison County Courthouse  
Edwardsville, IL 62024



Re: Asbestos cases

Dear Sir:

Enclosed please find the following which we ask that you file:

|                            |        |
|----------------------------|--------|
| Complaint                  | ( )    |
| Answer                     | ( )    |
| Demand for Jury Trial      | ( )    |
| Interrogatories            | ( )    |
| Request to Produce         | ( )    |
| Notice of Deposition       | ( )    |
| Answers to Interrogatories | ( xx ) |
| Notice of Compliance       | ( xx ) |
| Motion                     | ( )    |
| Original Retained          | ( )    |
| Other                      | ( )    |
| Check Enclosed             | ( )    |

Very truly yours,

DONOVAN, ROSE, NESTER &  
SZEWCZYK, P.C.

BY Michael J. Nester  
Michael J. Nester

MJN:cd  
Enclosure

cc: Attorneys of Record



IN THE CIRCUIT COURT  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

|                                   |   |                     |
|-----------------------------------|---|---------------------|
| DONALD SINCLAIR, ROBERT SINCLAIR, | ) |                     |
| AND GEORGE WENNER, ROY CARSON,    | ) |                     |
| BRUCE LUSK AND EDWARD MEINERS,    | ) | 86-L-451            |
| ELAINE HARDISON ETC.,             | ) | 86-L-450            |
| WILLIAM ADAMS THROUGH LEWIS       | ) | 86-L-453            |
| FLEURY,                           | ) | 86-L-824            |
| Plaintiffs,                       | ) | 86-L-836            |
| v.                                | ) | 86-L-1024           |
| ANCHOR PACKING COMPANY, ET AL,    | ) | 86-L-1827-86-L-2458 |
| Defendants.                       | ) |                     |

GENERAL OBJECTIONS TO INTERROGATORIES  
AND REQUEST TO PRODUCE

A.W. Chesterton sets forth the following General Objections to Plaintiff's Interrogatories and Request to Produce and incorporates each of these objections by reference to every response provided hereinafter:

1. The Interrogatories and Request to Produce are overly broad, unreasonably burdensome, harassing, cumbersome, vague, ambiguous and not intended nor reasonably calculated to lead to the discovery of admissible or relevant evidence.

2. The Interrogatories and Request to Produce are difficult to understand or unintelligible due to the use of particular phrases or terms which have more than one meaning within and without the industry.

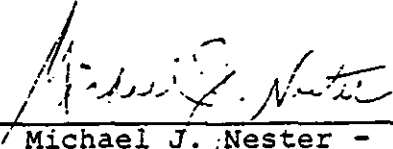
3. The Interrogatories and Request to Produce are of excessive depth in time, not being limited to the matters in dispute as said forth in the Complaint. The Interrogatories and Request to Produce go back many years in time and A.W. Chesterton has found it difficult, and in some cases impossible, to reconstruct or retrieve the information requested.

4. The burden is upon plaintiffs to establish his exposure to products manufactured by A.W. Chesterton in order to recover based on his allegations againsts A.W. Chesterton. To the extent that plaintiffs have not identified any product of A.W. Chesterton to

which they have been exposed, the Interrogatories and Request to Produce herein are irrelevant and immaterial to any issue in this litigation and are not calculated to lead to the discovery of admissible evidence. Further, to require A.W. Chesterton, under such circumstances, to respond to questions requiring disclosure of masses of irrelevant information is beyond the scope of permissible discovery.

5. Notwithstanding these objections, A.W. Chesterton, responds to the Interrogatories and Request to Produce based upon facts known or believed by A.W. Chesterton at the time of it's answer pursuant to Court Order. These answers provided herein do not in any way waive the objections stated hereinabove.

BY

  
Michael J. Nester - #02037211  
DONOVAN, ROSE, NESTER  
& SZEWCZYK, P.C.  
8 East Washington Street  
Belleville, Illinois 62220 .  
(618) 235-2020

IN THE CIRCUIT COURT  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

|                                                      |   |                     |
|------------------------------------------------------|---|---------------------|
| DONALD SINCLAIR, ROBERT SINCLAIR, AND GEORGE WENNER, | ) | Nos. 86-L-451,      |
| ROY CARSON, BRUCE LUSK, AND EDWARD MEINERS,          | ) | 86-L-450, 86-L-453, |
| ELAINE HARDISON, SPEC. ADMINISTRATOR OF THE          | ) | 86-L-824, 86-L-836, |
| ESTATE OF LESLIE HARDISON,                           | ) | and 86-L-834        |
| WILLIAM ADAMS, through LEWIS FLEURY,                 | ) | No. 86-L-1024       |
|                                                      | ) | No. 86-L-1827       |
|                                                      | ) | Through             |
| Plaintiffs,                                          | ) | No. 86-L-2458       |

vs.

ANCHOR PACKING COMPANY; A.P. GREEN REFRACTORIES )  
CO.; A.W. CHESTERTON, INC.; ARMSTRONG WORLD )  
INDUSTRIES, INC.; AMERICAN WIRE & CABLE; ATLAS )  
ABESTOS; THE BABCOCK & WILCOX COMPANY; )  
BENJAMIN FOSTER CO., DIVISION OF AMCHEM )  
PRODUCTS, INC.; BIGLOW-LIPTAK CORP.; THE )  
CARBORUNDUM COMPANY, INCORPORATED; THE-CELOTEX )  
CORPORATION; CERTAIN-TEED CORPORATION; CHARLES )  
TAYLOR SONS CO.; CHICAGO FIRE BRICK COMPANY; )  
CHRISTY FIREBRICK CO.; COMBUSTION ENGINEERING; )  
CORHART REFRACTORIES COMPANY; CRANE PACKING )  
COMPANY; CROWN CORK & SEAL COMPANY, INC.; )  
DIDIER TAYLOR REFRACTORIES CORPORATION; EAGLE- )  
PICHER INDUSTRIES, INC.; ELLIS SAFETY PRODUCTS )  
CO.; FIBREBOARD CORPORATION; THE FLINTKOTE )  
CORPORATION; GARLOCK, INC.; GENERAL REFRACTORIES )  
COMPANY; GENERAL ELECTRIC COMPANY; GEORGIA )  
PACIFIC; GENERAL GASKET CORP.; GRANT WILSON, )  
INC.; GUNNING REFRACTORIES, INC.; HARBISON- )  
WALKER CORPORATION; HESTER-BRADLEY CO.; H.K. )  
PORTER COMPANY; INTERNATIONAL INSULATION CO.; )  
INTERNATIONAL VERMICULITE; J.H. FRANCE )  
REFRACTORIES COMPANY; JOHN E. BRAZEE & CO.; )  
J.P. BUSHNELL PACKING; KAISER REFRACTORIES, A )  
DIVISION OF KAISER ALUMINUM & CHEMICAL )  
CORPORATION; KEENE CORPORATION; KENNECOTT )  
CORPORATION; KIMBALL SAFETY PRODUCTS; LACLEDE )  
CHRISTY CORPORATION; LAWRENCE REFRACTORIES; )  
M.A. BELL CO.; M.H. DETRICK COMPANY; MEXICO )  
REFRACTORIES CO.; MIDWESTERN SAFETY EQUIPMENT )  
CO.; MINE SAFETY APPLIANCES COMPANY; )  
MINNESOTA MINING AND MANUFACTURING COMPANY; )  
MUNDET CORK COMPANY; NATIONAL ELECTRIC COIL CO.; )  
NATIONAL GYPSUM COMPANY; NATIONAL REFRACTORIES, )  
INC.; NICOLET INDUSTRIES, INC.; NORTH AMERICAN )  
REFRACTORIES COMPANY; OWENS-CORNING FIBREGLAS )  
CORPORATION; OWENS-ILLINOIS, INC.; PFIZER, INC.; )  
PITTSBURGH CORNING CORPORATION; PLIBRICO )  
COMPANY; QUIGLEY COMPANY; RAYMARK INDUSTRIES, )  
INC.; THE ROCKBESTOS CO.; ROCK WOOL )  
MANUFACTURING CO.; THE SAGER CORPORATION; )  
SOUTHERN TEXTILE CORPORATION; SURFACE )  
COMBUSTION; THERMIC REFRACTORIES, INC.; UNITED )  
STATES GYPSUM COMPANY; U.S. MINERAL & CHEMICAL )

### INTERROGATORIES TO DEFENDANTS

TO: A.W. CHESTERTON, INC.

Please take notice that pursuant to Rule 213 of the Illinois Rules of Civil Procedure, you are required within Thirty (30) days after service hereof to serve upon the undersigned sworn answers to the following interrogatories. The defendant corporation or company shall designate an officer or agent to answer the interrogatories who shall answer the interrogatories by providing all of the information available to the organization whether the answering individual personally knows it or not. Each interrogatory is to be answered fully and separately.

### DEFINITIONS

As used in these interrogatories:

A. With respect to all questions, all information is to be divulged which is within the knowledge, possession or control of the corporation or company to whom these interrogatories are addressed, as well as the corporation or company's attorneys, investigators, agents, employees or other representatives.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

B. "Defendant" includes the named defendant.

C. "Documents" include, without limitation, books, records, writing, notes, letters, correspondence with whomever, memoranda and recordings in possession or control of defendant or defendant's attorneys, investigators, agents, or employees. Such reference to documents includes originals and copies, microfilms and transcripts made, recorded, produced or reproduced by any means and every means. "Documents" also includes the content of any applicable computer database.

D. Where used with respect to documents, "identify" means to give the date, title, origin, author and addressee (where appropriate) to enable plaintiff to retrieve it from a file; and, further, "identify" means to give the name, address, position or title of the person who has custody of the document. Whenever identification is requested and defendant is willing to produce the documents voluntarily for inspection and copying without the necessity of plaintiff's filing a motion to produce, defendant may respond by stating when and where the document may be inspected, or by attaching a copy of the requested document to the answers to these interrogatories.

E. Where appropriate, the singular includes the plural and vice-versa.

You are to answer these interrogatories by placing your answers, when possible, in the spaces provided.

INTERROGATORY NO. 1: As to the person answering these interrogatories, state:

- (a) Name;
- (b) Title or position with defendant;
- (c) Business Address;
- (d) Length of time employed by defendant;
- (e) State year by year all other positions, titles or jobs that person has held with the defendant.
- (f) The years during which Defendants have been licensed to do business within the State of Illinois, or State of Missouri and with regard to such years please state:
  - (1) The type of business conducted within the State of Illinois or State of Missouri;
  - (2) The names and addresses of any franchise holders, dealers, or customers located in the State of Illinois or State of Missouri during the last three years;
  - (3) Whether or not Defendant directly or indirectly supplies the persons or entities identified in 1.(f)(2) with any products or services; if so, please describe the relationship between Defendant and those persons or entities and state the approximate dollar value of Defendant's 1930 to present sales to them

- ANSWER:
- (a) Chester M. Howe
  - (b) General Counsel
  - (c) 29 East Street, Stoneham MA
  - (d) 3 months
  - (e) none
  - (f) Not qualified in Missouri: qualified in 1982 in Illinois.
  - (1) Sales of products manufactured by defendant.
  - (2) There are three distributors within 100 miles of Madison County to whom Chesterton sold its

INTERROGATORY NO. 2: Has the person answering

(con'

these interrogatories made reasonable inquiry of all available sources of information such that plaintiff may rely on these answers as the truthful and complete answers made on behalf of this answering defendant? State the proper legal name and the present address of the principal place of business of each of defendant's related companies. For each related company identified, please state:

- (a) Whether or not the company is licensed to do business in the State of Illinois
- (b) The business relationship between the company and defendant;
- (c) The nature of the products or services that defendant sells to or purchases from the company;
- (d) The type of business the company conducts within the State of Illinois;
- (e) Whether or not the company advertises Defendant's products or services within the State of Illinois;
- (f) Whether or not the company sells defendant's products or services within the State of Illinois; and, if so, the approximate value of those sales or services during 1930 to present;

ANSWERS TO INTERROGATORIES

CON'T.

1. (f)
  - (2) products. They are Sealing Specialists, Inc., 1721 South 7th Street St. Louis, MO 63104, Industrial Engineering Sales Corp., 1958 West River Drive, Davenport, Iowa 52808 and Danville Industrial Supply Company 35 North Washington Avenue, Danville, IL 61834.
  - (3) See answer to Interrogatory (f) (2). In addition, until the mid 1960's A.W. Chesterton's total annual world wide sales were under \$10,000,000.00.

- (g) Whether or not the company pays any type of taxes to the State of Illinois or any political body located within the State of Illinois;
- (h) Whether or not defendant has any control, directly or indirectly, over the company's advertising of defendant's products or services.

ANSWER:

- (a) A.W. Chesterton Company, LTD.  
Ontario, Canada
- (b) LTD. is a 75% owned subsidiary of defendant.
- (c) None
- (d) None
- (e) No
- (f) N/A
- (g) No
- (h) Yes

INTERROGATORY NO. 3: State the following  
concerning this defendant:

- (a) Full and Correct name;
- (b) Principal place of business;
- (c) State of incorporation;
- (d) Date of incorporation, and name of Corporation;
- (e) Is this defendant authorized to transact business in the State of Illinois? If so, state the date such authority was first issued and last renewed;
- (f) Does this defendant have an agent, representative or place of business in Illinois? If so, state the name and address of such agent, representative, or other place of business;
- (g) Does this defendant have an agent for service in the State of Illinois? If so, state the name and address of the registered agent.

ANSWER: (a) A.W. Chesterton Company  
(b) Stoneham, MA  
(c) MA  
(d) 1886, A.W. Chesterton Company  
(e) Yes. 1982.  
(f) Robert Congdon, 747 Church, St. Elmhurst, IL 60126  
(g) C.T. Corporation

INTERROGATORY NO. 4: Has this defendant been sued under its correct name? If not, state the correct legal name of the defendant and provide the information requested in No. 3 above concerning the defendant as correctly named.

ANSWER: The correct name of the defendant is A.W. Chesterton Company

INTERROGATORY NO. 5: Has this defendant ever acquired through purchase, reorganization or merger another corporation, company, or business which manufactured, sold processed, distributed or contracted to apply asbestos products?

ANSWER: See answer to Interrogatory No. 2.

INTERROGATORY NO. 6: If the answer to Interrogatory No. 5 is "Yes", then state the following concerning such predecessor:

- (a) Full and correct name;
- (b) The principal place of business;
- (c) State of incorporation;
- (d) Date of acquisition by defendant;
- (e) Was this business authorized to transact business in the State of Illinois?
- (f) Attach copies of all papers pertaining to the acquisition.

ANSWER: A.W. Chesterton Ltd., A Canadian Corporation was acquired in 1924. It is not authorized to transact business in the state of Illinois.

INTERROGATORY NO. 7: As to any product containing asbestos in any form, has this defendant, or any predecessor(s):

- (a) Ever designed such a product?
- (b) Manufactured such a product?
- (c) Processed such a product?
- (d) Sold such a product?
- (e) Distributed such a product?
- (f) Patented such a product?
- (g) Relabeled such a product which was manufactured, sold, or distributed by another company?

ANSWER: (a) Yes  
(b) Yes  
(c) No  
(d) Yes  
(e) Yes  
(f) No  
(g) No

INTERROGATORY NO. 8: If your answer to No. 7(b), 7(d) and 7(e) is "Yes", then give the trade name of the product, the year the defendant or predecessor first sold or distributed such product, and the year the defendant last sold or distributed such product.

ANSWER: Packings of a variety of styles have been manufactured and sold throughout most of the companies history. No compilation of the requested dates exists. Attached to defendant's Request to Produce is a document entitled Chesterton Product History itemizing packings and gaskets that contain asbestos as one of multiple ingredients.

INTERROGATORY NO. 9: Have any of the products listed above in Interrogatories No. 7 been altered in chemical composition since first being marketed?

ANSWER: See answer to Interrogatory No. 8.

INTERROGATORY NO. 10: If so, please state:

- (a) The trade name of each such product;
- (b) The date each such product was altered;
- (c) The nature of the alteration;
- (d) The reason for the alteration.

ANSWER: See answer to Interrogatory No. 8.

INTERROGATORY NO. 11: What is the name, address, and the job title of each individual who participated in the design and preparation of manufacturing specification for each such product?

ANSWER: Many persons have been involved over many years in the preparation of product specifications who are long deceased or retired. Information no longer exists which would enable A.W. Chesterton to prepare a meaningful response to this Interrogatory.

INTERROGATORY NO. 12 Do any written memoranda, specifications, blueprints or other written materials of any kind or character relating to the design and preparation of said products now exist?

ANSWER: Unknown at this time. Investigation continuing.

INTERROGATORY NO. 13: If so, please state:

- (a) List each written material or document;
- (b) Who presently has possession of each such document?
- (c) Where is it located?

ANSWER: See Answer to Interrogatory No. 12.  
A compilation of the requested data  
is extremely burdensome. If a specific  
style number of products can be  
identified defendant will attempt  
to respond.

INTERROGATORY NO. 14: In what year did the  
defendant first begin selling or distributing any products  
containing asbestos?

ANSWER: Unknown at this time, investigation  
continuing.

INTERROGATORY NO. 15: In what year did the  
defendant last sell the any product which contained  
asbestos?

ANSWER: Defendant currently sells packing  
and gaskets containing asbestos  
which are encapsulated.

INTERROGATORY NO. 16: As to the named defendant  
or any predecessor(s) or acquired business, state the  
various types of products, such as blocks, pipe covering,

cements, tape, spray-on insulation, mastics, and cloth, or any other asbestos containing products and in connection with each type of such product, state how the same was packaged (i.e., bags, boxes, sacks, etc.) for sale.

ANSWER: Valve packings boxed in cardboard box with metal edges, sheet gasket in bags, rope and wick in 2 inch x 2 inch cardboard boxes.

INTERROGATORY NO. 17: Is your company, as of the date of answering these interrogatories, still manufacturing, selling or distributing any products containing asbestos? If so, give the brand names of such products, the binding material and date first manufactured.

ANSWER: Yes, the packings generally are identified by a style number rather than a brand name. Binding material for packings include teflon, peterolatum and graphite, SBL rubber and nitrate are other binders for gaskets.

INTERROGATORY NO. 18: Were each of your asbestos containing products generally expected to reach, or were packaged to reach, the consumer or user, without substantial change in the condition in which it was sold?

ANSWER: Yes.

INTERROGATORY NO. 19: If your answer to Interrogatory No. 18 is "No", with respect to any product, explain in what way the defendant claims its products were altered or substantially changed after sale or distribution and before reaching the helper, mechanic or bystander.

ANSWER: Not applicable.

INTERROGATORY NO. 20: Based upon the material contents of your products, the method of manufacturing, and the method of application, can your products be generally applied or installed without liberating asbestos fibers?

- (a) If there is a different answer concerning different products manufactured, sold, distributed, or used by your company then specify the different products by exact manufacturers name and popular name.
- (b) If there is a difference in your answer depending on the year or years in which a particular product was used, then specify in detail what year or years you are referring to and the specific products you are referring to and the year involved.

ANSWER: Yes.

- (a) Not applicable.
- (b) Not applicable.

INTERROGATORY NO. 21: Was it a foreseeable use of your asbestos containing products that they may have to be removed, stripped or replaced at any time after installation? If your company contends the plaintiff(s) misused any of your products then state how and under what circumstances your product was misused.

ANSWER: Yes.

Insufficient information to respond at this time.

INTERROGATORY NO. 22: Prior to releasing the asbestos products manufactured, sold, etc. to the public for sale, were any tests conducted on same to determine potential health hazards involved in the use of materials contained therein?

ANSWER: All tests required by law are performed.

INTERROGATORY NO. 23: If so please state:

- (a) The name, address, and job classification of each individual who conducted such tests.
- (b) The results of such said tests.
- (c) Date of such studies.

ANSWER: Not applicable.

INTERROGATORY NO. 24: Do any written memoranda, specifications, blueprints or other written materials of any kind or character exist relating to the testing of said product?

ANSWER: None other than to the extent required by OSHA.

INTERROGATORY NO. 25: If so, please state:

- (a) List each such written material or document.
- (b) Who presently has possession of each such document and where it is located.

ANSWER: See Answer to Interrogatory No. 24, investigation continuing.

INTERROGATORY NO. 26: Did defendant or any of its subsidiary companies make any design changes as a result of such tests?

ANSWER: No.

INTERROGATORY NO. 27: If so, please state:

- (a) The nature of the change made.
- (b) The name, address, and job classification of each person in charge of making a change.

ANSWER: Not applicable.

INTERROGATORY NO. 28: After releasing said products to the public, were any tests conducted thereon to determine potential health hazards involved in the use of materials contained therein?

ANSWER: All tests required by law are performed.

INTERROGATORY NO. 29: If so, please state:

- (a) The name, address, and job classification of each person conducting said tests.

(b) The results of said tests.

ANSWER: Any such tests are under the direction of Lawrence B. Maglin, Enviromental Safety Health Coordinator at the defendant's headquarters.

INTERROGATORY NO. 30: Prior to 1970, did you or your predecessor(s) ever have any labor inspectors or anyone from your company whose job it was to go to areas where your products were being used or installed to make a dust level count? If so, state when this procedure started, the purpose of such procedure, and what action, if any, was taken in response to the findings, and attach results.

ANSWER: Fiber counts were taking during the manufacturing operation at least annually. No dust level counts were taken with respect to the products produced.

INTERROGATORY NO. 31: If your company performed or had performed any dust level counts, what action based on the results did your company take?

ANSWER: None.

INTERROGATORY NO. 32: Has your company or its predecessor(s) ever conducted any studies concerning the

effects of the inhalation of asbestos dust or fibers on one using or being exposed to any of the asbestos materials manufactured, sold or distributed by you, or your predecessor(s)? If answer to this question is "Yes", give the date and nature of such studies, if any; the name or names of the persons conducting such studies and their addresses; what the purpose of the studies were; and attach a copy of any reports based upon such studies, showing to whom such reports were given, and the date.

ANSWER: No.

INTERROGATORY NO. 33: Has your company or its predecessor(s) ever conducted or caused to be conducted any studies designed to minimize or eliminate the inhalation of asbestos dust and fibers by those exposed to the use of your company's asbestos products? If so, give the following:

- (a) Name of the person or firm conducting such studies.
- (b) The date the studies began and the date completed.
- (c) Any publication or dissemination of the results of the studies.
- (d) The nature of any action to eliminate or minimize inhalation of asbestos dust or fibers.
- (e) Attach copies.

ANSWER: No.

INTERROGATORY NO. 34: If your answer to Interrogatory No. 33 is "Yes", state the name and address of such industrial hygienist or hygienists.

ANSWER: Not applicable.

INTERROGATORY NO. 35: Does your company have, has it ever had, or has your predecessor(s) ever had, a Research Department? If so, give the year such Research Department was established, and whether or not such Research Department has operated continuously since being established.

- (a) How much expended each year on research, etc.
- (b) What percentage of gross sales did your company or its predecessor(s) spend on research concerning the health affects of asbestos.

ANSWER: Yes, investigation continuing.

INTERROGATORY NO. 36: Prior to 1965, did your company, or any predecessor(s), ever at any time give persons who would be applying or removing your asbestos products instructions concerning safety precautions to use in applying such products? If so, describe such instructions, to whom they were given, the dates they were given, and the manner of giving such instructions.

ANSWER: Defendant has complied with OSHA labeling requirements with respect to asbestos containing products and has a continuous training program for representatives of defendant.

INTERROGATORY NO. 37: Did your company, or your predecessor(s), ever place any warning signs on the containers in which asbestos products were packaged?

ANSWER: Yes.

INTERROGATORY NO. 38: If you have answered

Interrogatory No. 37 in the affirmative, please state:

- (a) On what date did your company, or your predecessor(s), issue an order directing a warning be placed on your asbestos products, or containers?
- (b) On what date was such warning actually first placed on your asbestos products or containers?
- (c) On what date did your asbestos products, accompanied by such warning, first reach the contractor?
- (d) State the exact wording of the first warning.
- (e) State the exact size of the warning printed on your asbestos products or container.
- (f) Did your company, or its predecessor(s) dictate the exact size of the printed warning?
- (g) Why did your company or its predecessor(s) place such warning on your asbestos products or containers?
- (h) Did your company or its predecessor(s) place such warning on your asbestos products or containers because you received a directive, command, suggestion, legal opinion, or any type of communication (written or otherwise) from any person, firm, corporation, governmental agency, committee, association, attorney or institute? If so, from whom and on what date did you receive such directive, command, suggestion, legal opinion, or other type of communication.
- (i) If the wording of the warning has ever been changed or altered, state when it was changed and the exact change in the wording.

ANSWER: (a) No "Order" was issued.  
(b) Early 1970's.  
(c) Not applicable.  
(d) See Response to Request to Produce.  
(e) See Response to Request to Produce.  
(f) Unknown.  
(g) In response to OSHA Publications.

(con't)

INTERROGATORY NO. 39: Did your company or its predecessor(s) ever place any warning directly on any of its asbestos pipe covering, block, cloth, millboard or other asbestos products?

ANSWER: No.

INTERROGATORY NO. 40: Did your company ever stamp the name of the company, its initials, or any identifying logo on any of its asbestos pipe covering, blocks, cloth, millboard or other asbestos product?

ANSWER: No.

INTERROGATORY NO. 41: Did the warning inquired about in Interrogatories 39 and 40, or similar warning, ever appear in any of your sales literature? If so, attach copies of such sales literature, showing the date such literature was printed.

ANSWERS TO INTERROGATORIES

CON'T.

38. (h) In response to OSHA Publications.  
(i) Unknown.

ANSWER: No.

INTERROGATORY NO. 42: On what date was the sales literature inquired about in Interrogatory No. 41 first provided to distributors or sellers of your company's asbestos products, or your predecessor(s)'s products?

ANSWER: No.

INTERROGATORY NO. 43: Were any material safety data sheets ever prepared by your company or its predecessor(s)? If so, attach copies.

ANSWER: The MSDS Sheets were first created in 1986.

INTERROGATORY NO. 44: Did your company or its predecessor(s) ever recall any products containing asbestos from the common market?

- (a) State all details of such recall, giving the name of the product, the time of recall and any further action taken in connection with the recall.

ANSWER: No.

INTERROGATORY NO. 45: Has your company or its predecessor(s) ever directly advised any contractor to whom you sell your products containing asbestos of threshold limit values for exposure to asbestos dust recommended by the American Conference of Governmental Industrial Hygienists? If so, state the date or dates that you so advised such contractors, the manner in which you advised such contractor, and the name of each contractor.

ANSWER:

Defendant does not sell to contractors.

INTERROGATORY NO. 46: Prior to 1964 did your company or its predecessor(s) ever manufacture products containing asbestos without a warning? List the years.

ANSWER: Yes, all years prior to 1964.

INTERROGATORY NO. 47: After 1964 did you ever manufacture products containing asbestos without a warning? If so, list the name of the product and the years.

ANSWER: Yes, encapsulated asbestos used in packing and gaskets.

INTERROGATORY NO. 48: Is your company, as of the date of answering these interrogatories, still manufacturing, selling or distributing any products containing asbestos? If so, give the brand names of such products and the binding material and dates of first manufacture of such product.

ANSWER: See Answer to Interrogatory No. 17.

INTERROGATORY NO. 49: Did your company or any predecessor(s) ever have a division or subsidiary company engaged in the contracting business of applying asbestos products? If so, give the name of such division or subsidiary company, the full address of the home office of such division or subsidiary company, and the dates such division or subsidiary company was engaged in the contracting business.

ANSWER: No.

INTERROGATORY NO. 50: Did any division of your company or subsidiary company engaged in the contract business of applying asbestos products or your workmen's compensation insurance carrier ever have any claims for lung diseases or death from lung diseases, whether directly or indirectly attributed to asbestosis, mesothelioma, lung cancer, or any exposure to asbestos products prior to 1972? If the answer is "Yes", give the name of such employees and attach copies of such claims and copies of all documents relating to the disposition and handling of such claims.

ANSWER: No.

INTERROGATORY NO. 51: Give the location of the state industrial accident board handling each such claim, the disposition of such claims, and the amounts paid in workmen's compensation benefits to each such employee, and the name of the compensation carrier.

ANSWER: Pursuant to Court Order, No response to this Interrogatory is required.

INTERROGATORY NO. 52: Did your company or its predecessor(s) ever make any industrial hygiene surveys concerning it's asbestos products? If so, give the date of such surveys, and attach copies of such surveys.

ANSWER: OSHA requirements have been fulfilled at all times for the benefit of defendant's employees.

INTERROGATORY NO. 53: State the year that this defendant or any predecessor(s) was first advised of either threshold limit values or maximum allowable concentrations of both asbestos dust and total dust by the American Conference of Governmental Industrial Hygienists, and state the name of the employee-official of the company receiving such advise and attach copies of the instrument communicating such advise.

ANSWER: Sometime after 1980. Richard Hoyle, then Director of Corporate Development & Training, learned from literature of ACGIH positions.

INTERROGATORY NO. 54: Was such threshold limit values or maximum allowable concentrations inquired about in Interrogatory No. 53 TOTAL dust and not just asbestos dust?

ANSWER: No.

INTERROGATORY NO. 55: State in detail what test, if any, your company ever made with regard to the quantity, quality or threshold limit values or asbestos dust or particules to which applicators or consumers of your product were exposed while using your products containing asbestos.

- (a) If there were any such tests or studies, give the name or names of the person(s) conducting the tests, the date of the tests and attach true copies of any reports, findings or memorandums concerning such tests or studies.

ANSWER: Tests on the product were commenced in about 1985 or 1986.

INTERROGATORY NO. 56: When did any official with your company first have knowledge, information or understanding that asbestos would or could or might produce the diseases of:

- (a) Asbestosis;
- (b) Mesothelioma;
- (c) Lung cancer;
- (d) Any other diseases;
- (e) With reference to your company give the name of such official who first had such knowledge list them and attach copies.
- (f) If there are any documents, records or memorandums of any kind concerning such knowledge, list them and attach copies.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 57: Do you have any photographs of the products inquired about above or their packages or containers? If so, please attach exact copies.

ANSWER: See defendants Response to Request to Produce. Investigation continuing.

INTERROGATORY NO. 53: Has the answering defendant or any of its predecessors ever mined asbestos? If so, state the dates in which such mining took place and the locations of the mines.

ANSWER: No.

INTERROGATORY NO. 50: List by brand name every product containing asbestos which defendant or defendant's predecessors has manufactured since 1910. As to each such product, please state the following:

- (a) The type of product (e.g., acoustical plaster, fireproofing, concrete, etc.);
- (b) The date the product first went into production;
- (c) The date the product was discontinued from production;
- (d) The last date the product was sold;
- (e) All manufacturing locations of the product;
- (f) The identity of the plant manager(s) or managing agent(s) of defendant who has knowledge of the products manufactured by defendant and its predecessor(s), and who may be called upon by plaintiffs to testify by deposition.

ANSWER: See Response to Request to Produce.

INTERROGATORY NO. 60: As to each product identified in response to the foregoing interrogatory please indicate:

- (a) The type of asbestos contained in the product as it was first manufactured;
- (b) The percentage of asbestos contained in the product as it was first manufactured;

- (c) Any modifications to the product which altered the percentage or type of asbestos in the product and the dates of such modification;
- (d) The source of asbestos in each product;
- (e) The color, physical characteristics, and appearance of each product;
- (f) A full and complete description of the package in which the product was sold, including, but not limited to, type of package, size, color(s), and writings thereon;
- (g) All other names under which the product was sold;
- (h) The number and date of each patent or patent application as to the product;
- (i) If the product continued to be produced after the deletion of asbestos, all reasons why the asbestos was deleted, the identity of the person who made the decision to delete the asbestos, and the date the product was first produced without the asbestos;
- (j) If the product is no longer produced, all reasons it was discontinued, the identity of the person who made the decision to discontinue the product, the brand name of replacement product, and the date the replacement product first went into production;
- (k) The identity of the custodian, managing agent, or employee who has photographs, drawings, or labels for each product;
- (l) The reasons why asbestos was used as an ingredient in each such product;
- (m) The content of any warning labels, inserts or other writings provided with such product with ever such printed warning, what period of time it has or had accompanied the product, the exact wording of the warning, any amendments made to the

the wording, whether the warning was located on each product or packaging, and on what asbestos products the warnings appear(ed):

- (n) Any special instructions provided with such product regarding the use, protection or safety procedures to be employed by persons handling such product.

ANSWER: (a) Chrysotile;  
(b)- (n) See Response to Request to Produce.

INTERROGATORY NO. 61: With respect to your Answer in Interrogatory No. 60, did you specifically inform the purchaser or user of your products during the same time period that your products were manufactured and sold that such products could cause cancer, asbestosis, and other serious diseases?

ANSWER: Defendant complied with all OSHA standards regarding warnings on its products. Defendant objects to this Interrogatory insofar as it assumes a medical causal connection between its products and the above mentioned conditions and diseases.

INTERROGATORY NO. 62: Identify the distribution chain of defendant's asbestos products since 1925 along with any documents evidencing or confirming such chain, including but not limited to distribution from and to other defendants.

ANSWER: See Answer to Interrogatory 1 (f).  
Unknown at this time. Investigation  
continuing.

INTERROGATORY NO. 63: Identify your distributors  
and/or suppliers of raw asbestos, asbestos cement and other  
asbestos products with which you had business contact.

ANSWER: Pursuant to Court Order, no response  
to this Interrogatory is required.

INTERROGATORY NO. 64: Is this defendant aware or  
has it possessed knowledge concerning the reported causal  
connection between exposure to asbestos or asbestos products  
and:

- (a) asbestosis?
- (b) lung cancer?
- (c) mesothelioma?
- (c) other cancer?

ANSWER: Yes.

INTERROGATORY NO. 65: If answer to preceding Interrogatory as to any or all of its subparts, is in the affirmative, identify:

- (a) When and how defendant first learned of such connection;
- (b) If knowledge was obtained by attendance at any conference, lecture, convention, symposium or meeting, identify such meeting and provide the identity of persons attending and documents obtained;
- (c) If knowledge was obtained from medical or scientific studies; or any other published work, identify same;
- (d) If otherwise obtained, identify manner of receipt of document or communication.

ANSWER:

The Chesterton Company is a member of the Fluid Ceiling Association which was formerly known as the Mechanical Packing Association. To the best of present knowledge, a meeting in the Pocanos Mountains in Pennsylvania was

INTERROGATORY NO. 66: With regard to any (con't)  
knowledge obtained subsequent to that identified in your answer to Interrogatory 65 (a) above, identify:

- (a) All documents or communications, oral or written, concerning the causal connection between exposure to asbestos or asbestos products and disease, and identity of persons so communicating;
- (b) Did answering defendant obtain from or transmit any such information to other defendants in this case? If so, identify:
  - (1) Manner of receipt or communication for each contact;

ANSWERS TO INTERROGATORIES

CON'T

65. held in approximately 1971 to 1972 at which a speaker from OSHA spoke about OSHA regulations including asbestos. Richard T. McDermott, President of A.W. Chesterton attended that meeting. Subsequent to that meeting, A.W. Chesterton was one of the first in the industry to fully comply with OSHA regulations.

(2) All documents and persons involved.

ANSWER: See Answer to Interrogatory No. 65.

INTERROGATORY NO. 67: As to any knowledge possessed by answering defendant at any time referred to in your answer to Interrogatory 64, did you educate your employees, distributors or purchasers of the hazards known to you and the safety precautions necessary to guard against cancer and other diseases arising from the use and handling of your products? If so, identify:

- (a) When and in what manner customers, insulators, factory workers and the general public were so informed;
- (b) Documents communicating or otherwise disseminating such information;
- (c) Programs initiated or sponsored to establish or promote safety procedures, methods or usage of equipment;
- (d) Published articles or reports by employees (present or prior), including those of medical directors, scientists, engineers or other professionals;
- (e) Symposia or lectures sponsored for the benefit of asbestos workers and/or the general public.

ANSWER: See Answer to Interrogatory No. 65.

INTERROGATORY NO. 68: When and by what manner were you first aware of the hazards relating to exposure to asbestos or asbestos products:

- (a) For inside insulators and contractors.
- (b) For outside insulators and contractors.

ANSWER: See Answer to Interrogatory No. 65.

INTERROGATORY NO. 69: If you have knowledge or information concerning the following, answer in the affirmative or negative, whether:

- (a) Early detection of mesothelioma results in any appreciable rate of cure or arrest;
- (b) A single exposure to asbestos may cause mesothelioma, other cancers or asbestosis;
- (c) Cumulative or multiple exposures to asbestos result in a greater risk of harm to the exposed person;
- (d) An outside insulator has a risk of harm from exposure to asbestos or asbestos products;

- (e) Stripping or removing old asbestos creates a greater risk of harm than installation of asbestos or asbestos products;
- (f) Cancer resulting from exposure to asbestos develops generally after:
  - (1) 1-5 years.
  - (2) 6-10 years.
  - (3) 11-20 years.
- (g) There is any known relationship between smoking and mesothelioma;
- (h) There is any reported cause of mesothelioma other than exposure to asbestos.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 70: As to each answer to Interrogatory 69, identify at least one person or document upon which answering defendant relies.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 71: Did you perform, direct to be performed, finance, sponsor or receive the results of any studies or tests concerning the relationship between asbestos exposure and asbestosis and/or cancer? If so, identify:

- (a) When, where and at what intervals such studies were performed;
- (b) Were such studies in writing or reported at a later date in writing;
- (c) Were the results of such studies published or otherwise disseminated? If so, state to whom and when;
- (d) Who performed such studies;
- (e) Will you produce the results of such studies at this time or state where the results are maintained.

ANSWER: No.

INTERROGATORY NO. 72 Identify the scientific or medical periodicals to which defendant, its medical department or industrial hygiene division subscribed from 1925 to the present, and the dates of such subscriptions.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 73 Did defendant, its medical department or industrial hygiene division maintain a medical and/or scientific library at any time from 1925 to the present? If so, state:

- (a) The dates such library existed;
- (b) The number of volumes maintained therein;
- (c) The number of employees, part-time or full-time, assigned to maintenance of said library, and to whom in the corporate structure those employees report(ed).

ANSWER: The Safety and Health department was established in 1985.  
The Library consists of all applicable environmental laws and regulations and a variety of articles and pamphlets.  
Two individuals are assigned to the department.

INTERROGATORY NO. 74: Identify all trade organizations, associations, or other entities, including but not limited to A.T.I., I.H.F., N.I.M.A., A.I.A., N.I.C.A., T.I.M.A., Q.A.M.A., P.I.C.A., or Q.A.P.A., to which you have belonged or in which you have participated since 1925, stating the applicable dates of such membership or participation.

ANSWER: None.

INTERROGATORY NO. 75: Identify all persons attending on your behalf any meetings held by trade organizations, associations, or other entities identified in answer to Interrogatory No. 74.

ANSWER Not applicable.

INTERROGATORY NO. 76: Identify the names or nature of all notes, reports, studies, or other writings submitted by you or received by you at meetings held by organizations described in answer to Interrogatory No. 74.

ANSWER Not applicable.

INTERROGATORY NO. 77: Identify any documents received by you from or submitted by you to those trade organizations, associations or other entities identified in answer to Interrogatory No. 74 relating to the relationship between asbestos exposure and disease.

ANSWER:  
Not applicable.

INTERROGATORY NO. 78: Identify all agreements, oral or written, between you, any of the other defendants in this lawsuit, and/or any other organizations, associations

or other entities identified in your answer to the Interrogatory No. 74 or any medical or scientific foundations, relating to the standardization of:

- (a) Specifications for asbestos cloth products;
- (b) Specifications for paper or burlap bags, or other packaging to be used for the transport and/or storage of asbestos cement;
- (c) Warning or caution labels to be applied to asbestos products and/or their packaging, cartons, containers, or boxes;
- (d) Methods of dissemination of public relations information to defendant's purchasers, advertisers, distributors, factory workers, contractors, insulators, users, consumers of asbestos products and/or the general public;
- (e) Safety equipment and/or protective clothing to be utilized while handling defendant's asbestos products;
- (f) Medical programs to be offered or sponsored by defendant.

ANSWER: None.

INTERROGATORY NO.79: Did you direct to be performed, sponsor, finance, receive the results of or were you aware of any studies or tests performed by the Saranac Lake Laboratory of the Trudeau Foundation relating to asbestos exposure and its effects upon human life? If so, identify:

- (a) All documents summarizing findings or results of those studies or tests which you have in your possession or control;
- (b) All communications, oral or written, between answering defendant and Saranac personnel, including but not limited to Gerrit W.H. Schepers, M.D.
- (c) All documents relating to Saranac studies received or submitted by you either directly, though associated or predecessor companies, through other companies, or through any trade associations, organizations or other entities;
- (d) All recommendations or findings of such studies relating to:
  - (1) Adequacy or inadequacy of threshold limit values;
  - (2) Substitution of materials other than asbestos to be used in the insulation process.
- (e) Where documents and/or communications identified in answers to (a)-(d) of this Interrogatory are maintained.

ANSWER: No.

INTERROGATORY NO. 80: How many employees of answering defendant are known by defendant to be suffering from, have suffered from or whose deaths have been caused by asbestosis? State the date such disease of any employee was first known by defendant.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 81: How many employees of answering defendant are known by defendant to be suffering from, have suffered from or whose deaths have been caused by lung cancer? State the date such disease of any employees was first known by defendant.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 82: How many employees of answering defendant are known by defendant to be suffering from, have suffered from or whose deaths have been caused by mesothelioma? State the date such disease of any employee was first known by defendant.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 83: Do you send or have you at any time sent counsel or other representatives to courses at defending asbestos cases? If so, identify.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 84: Identify all expert witnesses who have testified in other cases, pending or otherwise, on behalf of answering defendant.

ANSWER: None.

INTERROGATORY NO. 85: Identify all present or former employees or answering defendant, other than plaintiffs, who have testified against this defendant in a litigation matter or before a governmental agency or unit.

ANSWER: None.

INTERROGATORY NO. 86: With respect to your answers to Interrogatories No. 84 and 85, identify all documents, including but not limited to transcripts or notes

of testimony employed by or resulting from the testimony of such expert witnesses or employees.

ANSWER: Not applicable.

INTERROGATORY NO. 87: Identify:

- (a) Any expert whom you intend to call as a witness or otherwise utilize in connection with this litigation;
- (b) The subject matter on which the expert is expected to testify;
- (c) The substance of the facts and opinions to which the expert is expected to testify;
- (d) A summary of the grounds for each opinion;
- (e) The address of such person and his field or expertise;
- (f) Identify and produce each treatise, article or text upon which the expert will rely in his testimony.

ANSWER: Pursant to Court Order, no response to this Interrogatory is required.

INTERROGATORY NO. 88: Identify and produce all board meeting minutes at which asbestos products, the hazards of asbestos exposure, the possible application of

warning labels on a asbestos containing products were discussed by the Board of Directors of your company.

ANSWER: Unknown at this time. Investigation continuing.

INTERROGATORY NO. 89: Please identify by name, address and phone number each person who has provided this answering party with statements in connection with this litigation.

ANSWER: See Answer to Interrogatory No. 1.

INTERROGATORY NO. 90: Please identify each person who has been interviewed in the course of preparing for the trial of this matter.

ANSWER: Pursuant to Court Order, no response to this Interrogatory is required.

INTERROGATORY No. 91: Has this Defendant ever sold any asbestos containing products to Insulation and Material Company of St. Louis, Missouri or any other individual, corporation, partnership or other business entities within a 100 mile radius of Madison County, Illinois since 1920 including but not limited to St. Louis County, St. Louis City, St. Charles County, Missouri or Madison County or St. Clair County, Illinois, if so state:

- a) List all individuals, corporations, partnerships or other business entities you have sold asbestos containing products to.
- b) State all dates when asbestos containing products were sold to these entities.
- c) State what asbestos containing products were sold to these entities and identify by brand name.
- d) State what quantity of asbestos products were sold to these entities.
- e) Provide copies of all purchase orders, specifications, contracts or correspondence with the entities identified in a) above or otherwise identify all documents relating to the sale.

ANSWER: See previous Answers to Interrogatories.

INTERROGATORY NO. 02: Have you ever sold any  
asbestos containing products to:

Monsanto, East St. Louis, Illinois  
Marathon Oil Refinery, Robinson, Illinois  
Shell Oil Company, Refinery, Roxana, Illinois  
Amoco Refinery, Wood River, Illinois  
Clark Oil Company Refinery, Hartford, Illinois  
Granite City Steel, Granite City, Illinois  
Illinois Power Company (Alton Powerhouse)  
Central Illinois Power Service (Coffeen  
Powerhouse)  
Commonwealth Edison (Kinkaid Powerhouse)  
Illinois Power Company (Portage Des Sioux  
Powerhouse)  
Central Illinois Power Service (Meredosia  
Powerhouse)  
Illinois Power Company (Grant Fork Powerhouse)  
Owens-Illinois Glass Co., Alton, Illinois  
Central Illinois Power Service (Baldwin  
Powerhouse)  
Central Illinois Power Service (Pearle Powerhouse)  
Central Illinois Power Service (Marion Powerhouse)  
Central Illinois Power Service (Newton Powerhouse)  
Texaco Oil Company Refinery, Lawrenceville,  
Illinois  
American Steel, Granite City, Illinois  
Cerro Copper, Granite City, Illinois  
Consolidated Aluminum Company, Granite City,  
Illinois  
Olin Corporation, East Alton, Illinois  
Laclede Steel Company, Alton, Illinois  
Sinclair Oil Refinery, Hartford, Illinois  
Apex Oil Refinery, Hartford, Illinois

and if so:

- a) List all individuals, corporations,  
partnerships, or other business entities  
you have sold asbestos containing products to.
- b) State all dates when asbestos containing  
products were sold to these entities.
- c) State what asbestos containing products were  
sold to these entities and identify by brand  
name.

d) State what quantity of asbestos containing products were sold to these entities.

e) Provide copies of all purchase orders, specifications, contracts or correspondence with the entities identified in a) above or otherwise identify all documents relating to the sale.

ANSWER: No, defendant sells to independent distributors.

INTERROGATORY NO. 93: Has this defendant ever been a General Contractor or Subcontractor where it used asbestos containing products at any of the following locations:

Monsanto, East St. Louis, Illinois  
Marathon Oil Refinery, Robinson, Illinois  
Shell Oil Company Refinery, Wood River, Illinois  
Amoco Refinery, Wood River, Illinois  
Clark Oil Company Refinery, Hartford, Illinois  
Granite City Steel, Granite City, Illinois  
Illinois Power Company (Alton Powerhouse)  
Central Illinois Power Service (Coffeen Powerhouse)  
Commonwealth Edison (Kinkaid Powerhouse)  
Illinois Power Company (Portage Des Sioux Powerhouse)  
Central Illinois Power Service (Meredosia Powerhouse)  
Illinois Power Company (Grant Fork Powerhouse)  
Owens-Illinois Glass Company, Alton, Illinois  
Central Illinois Power Service (Baldwin Powerhouse)  
Central Illinois Power Service (Pearle Powerhouse)  
Central Illinois Power Service (Marion Powerhouse)  
Central Illinois Power Service (Newton Powerhouse)

Texaco Oil Company Refinery, Lawrenceville,  
Illinois  
American Steel, Granite City, Illinois  
Cerro Copper, Granite City, Illinois  
Consolidated Aluminum Company, Granite City,  
Illinois  
Olin Corporation, East Alton, Illinois  
Laclede Steel Company, Alton, Illinois  
Sinclair Oil Refinery, Hartford, Illinois  
Apex Oil Refinery, Hartford, Illinois

and, if so:

- a) List all individuals, corporations, partnerships or other business entities you have sold asbestos containing products to.
- b) State all dates when asbestos containing products were sold to these entities
- c) State what asbestos containing products were sold to these entities and identify by brand name.
- d) State what quantity of asbestos products were sold to these entities.
- e) Provide copies of all purchase orders, specifications, contracts or correspondence with the entities identified in a) above or otherwise identify all documents relating to the sale.

ANSWER: No.

INTERROGATORY NO. 94: Did this defendant ever provide any warning concerning the hazards of asbestos to any of the following companies:

Monsanto, East St. Louis, Illinois,

Marathon Oil Refinery, Robinson, Illinois  
Shell Oil Company Refinery, Wood River, Illinois  
Amoco Refinery, Wood River, Illinois  
Clark Oil Company Refinery, Wood River, Illinois  
Granite City Steel, Granite City, Illinois  
Illinois Power Company (Alton Powerhouse)  
Central Illinois Power Service (Coffeen  
Powerhouse)  
Commonwealth Edison (Kinkaid Powerhouse)  
Illinois Power Company (Portage Des  
Sioux Powerhouse)  
Central Illinois Power Service (Meredosia  
Powerhouse)  
Illinois Power Company (Grant Fork  
Powerhouse)  
Owens-Illinois Glass Co., Alton, Illinois  
Central Illinois Power Service (Baldwin  
Powerhouse)  
Central Illinois Power Service (Pearle  
Powerhouse)  
Central Illinois Power Service (Marion  
Powerhouse)  
Central Illinois Power Service (Newton  
Powerhouse)  
Texaco Oil Company Refinery, Lawrenceville,  
Illinois  
American Steel Company, Granite City, Illinois  
Cerro Copper, Granite City, Illinois  
Consolidated Aluminum Company, Granite City,  
Illinois  
Olin Corporation, East Alton, Illinois  
Laclede Steel, Alton, Illinois  
Sinclair Oil Refinery, Hartford, Illinois  
Apex Oil Refinery, Hartford, Illinois

If so, identify what the warning was, how the warning was delivered and when the warning was delivered. Provide copy of warning and correspondence concerning the warning.

ANSWER: None known at this time other than provided in Notice of Compliance.

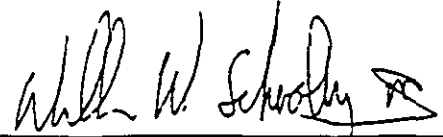
INTERROGATORY 95: Has this defendant ever had any

correspondence with any of the following companies or facilities concerning products containing asbestos:

Monsanto, East St. Louis, Illinois  
Marathon Oil Refinery, Robinson, Illinois  
Shell Oil Company Refinery, Wood River, Illinois  
Amoco Refinery, Wood River, Illinois  
Clark Oil Company Refinery, Hartford, Illinois  
Granite City Steel, Granite City, Illinois  
Illinois Power Company (Alton Powerhouse)  
Central Illinois Power Service (Coffeen Powerhouse)  
Commonwealth Edison (Kinkaid Powerhouse)  
Illinois Power Company (Portage Des Sioux Powerhouse)  
Central Illinois Power Service (Meredosia Powerhouse)  
Illinois Power Company (Grant Fork Powerhouse)  
Owens-Illinois Glass Co., Alton, Illinois  
Central Illinois Power Service (Baldwin Powerhouse)  
Central Illinois Power Service (Pearle Powerhouse)  
Central Illinois Power Service (Marion Powerhouse)  
Central Illinois Power Service (Newton Powerhouse)  
Texaco Oil Company Refinery, Lawrenceville, Illinois  
American Steel Company, Granite City, Illinois  
Cerro Copper, Granite City, Illinois  
Consolidated Aluminum Company, Granite City, Illinois  
Olin Corporation, East Alton, Illinois  
Laclede Steel Company, Alton, Illinois  
Sinclair Oil Refinery, Hartford, Illinois  
Apex Oil Refinery, Hartford, Illinois

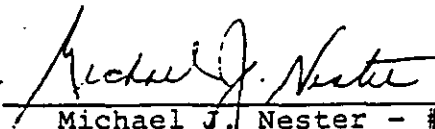
If so, provide copy of any correspondence with any of the above companies concerning asbestos containing products.

ANSWER: None known.



William W. Schooley, III  
Registration No. 6182213  
Bono, Haine & Schooley  
65 E. Ferguson Avenue  
P.O. Box 128  
Wood River, IL 62095  
(618) 254-4779

BY



Michael J. Nester - #02037211  
DONOVAN, ROSE, NESTER  
& SZEWCZYK, P.C.  
8 East Washington Street  
Belleville, Illinois 62220  
(618) 235-2020

IN THE CIRCUIT COURT  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

|                                     |                       |
|-------------------------------------|-----------------------|
| DONALD SINCLAIR, ROBERT SINCLAIR,   | )                     |
| and GEORGE WENNER;                  | )                     |
| ROY CARSON, BRUCE LUSK, and         | ) Nos. 86-L-451,      |
| EDWARD MEINERS;                     | ) 86-L-450, 86-L-453, |
| ELAINE HARDISON, Special Admin.     | ) 86-L-824, 86-L-836, |
| of the Estate of LESLIE HARDISON;   | ) and 86-L-834        |
| WILLIAM ADAMS through LEWIS FLEURY, | ) No. 86-L-1024       |
|                                     | ) No. 86-L-1827       |
| Plaintiffs,                         | ) through             |
|                                     | ) No. 86-L-2458       |
| vs.                                 | )                     |
|                                     | )                     |
| ANCHOR PACKING COMPANY,             | )                     |
| et al.,                             | )                     |
|                                     | )                     |
| Defendants.                         | )                     |

NOTICE OF COMPLIANCE

Comes now A. W. CHESTERTON, INC., by its attorneys, DONOVAN, ROSE, NESTER & SZEWCZYK, P.C., and for its response to plaintiffs' Request to Produce, states as follows:

1. See Answers to Interrogatories regarding sales of A. W. Chesterton products. See also Chesterton Product History summary attached hereto. Investigation continuing regarding other records of sales.

2. None.

3. See Chesterton Product History summary attached.  
Investigation continuing.

4. Pursuant to Court Order, no response to this request is required.

5. See attached catalogs.

6. See Answers to Interrogatories regarding sales to customers within a 100 mile radius of Madison County. Investigation continuing.

7. See response to Request No. 5.

8. None known at this time; investigation continuing.

9. None known at this time; investigation continuing.

10. See response to Requests to No. 5 and No. 8. Investigation continuing.

11. A large number of cases have been filed against this defendant. Such cases and records relating to such cases are matters of public record. Investigation continuing.

12. None known at this time; investigation continuing.

13. Pursuant to Court Order, no response to this request is required.

14. Pursuant to Court Order, no response to this request is required.

15. Pursuant to Court Order, no response to this request is required.

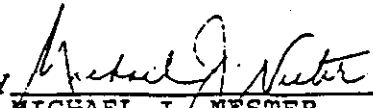
16. See attached warning. In addition, see response to Request No. 5. This defendant does not know of any asbestos-containing products provided to the facilities listed herein.

17. None known at this time; investigation continuing.

18. None known at this time; investigation continuing.
19. None known, at this time; investigation continuing.
20. None known at this time; investigation continuing.

A. W. CHESTERTON, INC.

By

  
MICHAEL J. NESTER #02037211  
DONOVAN, ROSE, NESTER & SZEWCZYK, P.C.  
8 East Washington Street  
Belleville, Illinois 62220