

FILE NAME: Riley Stoker (RS)

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Excerpt

RILEY POWER

57. Until 1972, Riley Power (formerly known as Riley Stoker Corporation, and hereinafter referred to as "Riley") incorporated and specified the use of asbestos-containing component parts into their industrial boilers. This would include gasket material, packing material, insulation material and asbestos rope. Riley had actual knowledge of asbestos hazards. This is in part evidenced by historical Worker's Compensation claims for asbestos-related disease which are disclosed in Riley's responses to San Francisco General Order No. 129 Standard Interrogatories, and which reference asbestos related claims by Ernest Moreno in 1947 and Lewis Munger in 1956. True and correct copies of these claims as well as these responses are attached hereto as Exhibits A - D).

58. These workers' compensation claims allege that workers who worked for Riley using asbestos-containing products had sustained injuries for asbestos exposure. Thus they are relevant to notice on the part of Riley as to the dangers of asbestos. Specifically, they show that Riley had actual knowledge, and direct notice as early as 1947 that people working with and around asbestos could sustain potentially disabling and even life threatening illnesses, namely asbestosis.

59. Therefore by the late 1940s, Riley was aware of the adverse health effects of its products, and yet took no action to disclose or reveal the hazard, or protect anyone from known hazards.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24 day of August, 2010, in Garrett Park, Maryland.


BARRY I. CASTLEMAN, Sc.D.