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December 26, 1991

Mr. Bill Long, District Clerk
Dallas County Courthouse
600 Commerce Street
Dallas, Texas 75202

Re: Cause No. 91-06526-I; Alvin Stenzel; Terry Yearout; John Blanton; Albert Goodner; Elmer Gray; and Willie Vaughn vs. Armstrong World Industries, Inc., et al.; in the 192nd Judicial District Court of Dallas County, Texas

Dear Mr. Long:

Please find enclosed the original of the following documents to be filed in the above referenced lawsuit: **United States Mineral Products Company's Response to Plaintiffs' Request for Production and Interrogatories.**

Please date and file stamp the additional copy of this letter and return to us in the enclosed envelope, in your usual manner.

Thank you very much for your assistance in this matter.

Very truly yours,

LIVINGSTON & MARKLE


Charles J. Argento

CJA:mf
Enclosures
060-321

cc: Mr. Roger G. Worthington
(CM/RRR #P-801-977-799)

All known counsel of record (w/out enclosure)



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Dear Mr. Long:

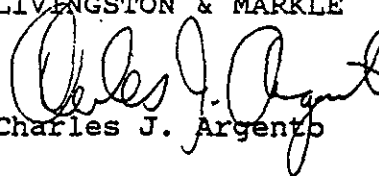
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DOCUMENT REQUEST NO. 1

Please produce each and every document identified in Exhibit A, attached hereto.

RESPONSE:

See attached.

INTERROGATORY NO. 1.

For each and every document produced in response to Request for Production No. 1 above, is said document a true and correct copy of the original document?

ANSWER:

Yes.

INTERROGATORY NO. 2

For each and every document produced in response to Request for Production No. 1 above, please answer the following:

- (a) Was said document kept, generated or received by Defendant United States Mineral Products Company and/or its predecessor(s)-in-interest in the regular course of business?

ANSWER:

Yes.

- (b) For each document produced in response to Request For Production No. 1 above, was it the regular course of business of Defendant United States Mineral Products Company and/or its predecessor(s)-in-interest for an employee or representative of Defendant United States Mineral Products Company and/or its

predecessor(s)-in-interest, with knowledge of the act, event, condition, opinion or diagnosis recorded to make the record or to transmit information thereof to be included in such record?

ANSWER:

Yes.

- (c) For each said document produced in response to Request For Production No. 1 above, was said document recorded by Defendant United States Mineral Products Company and/or its predecessor(s)-in-interest at or near the time or reasonably soon thereafter?

ANSWER:

Yes.

- (d) For each such document produced in response to Request For Production No. 1, is said document a "business record", as that term is used in the Texas Rules of Civil Procedure?

ANSWER:

Yes.

INTERROGATORY NO. 3

Please identify the name, address, phone number and job title of the custodian of records concerning asbestos products, asbestos-related disease and/or asbestos personal injury litigation for Defendant United States Mineral Products Company.

ANSWER:

Paulette A. Kaminski, Assistant Corporate Secretary, U.S. Mineral Products Co., Stanhope, NJ 07874.

REQUEST FOR PRODUCTION NO. 2

Please produce the index, catalogue, table of contents or any other such document which identifies or makes a record of documents kept by Defendant United States Mineral Products Company regarding the manufacture, marketing or sale of asbestos products and/or asbestos-related disease.

RESPONSE:

This request is overly broad, burdensome and seeks information irrelevant to Plaintiffs' claim and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the general objection above and to the extent that they exist, relevant, non-privileged, non-trade secret documents will be made available to Plaintiffs at a time mutually convenient to the parties at U.S. Mineral Products Company's home office.

INTERROGATORY NO. 4

For each document(s) identified in Exhibit A which Defendant has not agreed to produce herein, please state whether Defendant has produced said document(s) in response to discovery requests in other asbestos personal injury lawsuits and, if so, please identify the name and phone number of the attorneys to whom said documents were produced.

ANSWER:

All documents have been produced pursuant to this Request.

INTERROGATORY NO. 5

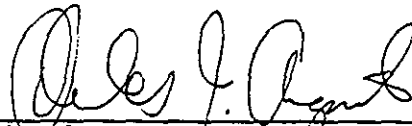
For each document(s) identified in Exhibit A which Defendant does not believe qualifies as a "business record" under the Texas Rules of Civil Procedure, has said document been deemed a "business record" by any Court in an asbestos personal injury lawsuit in which United States Mineral Products Company was a party? If so, please identify the name and phone number of the Plaintiff's attorney in said lawsuit(s).

ANSWER:

Not applicable.

Respectfully submitted,

LIVINGSTON & MARKLE



Charles J. Argento
Texas Bar No. 01301750
55 Waugh Drive, Suite 200
Houston, Texas 77007
(713) 861-9595
Attorneys for Defendant
U.S. Mineral Products Co.

CERTIFICATE OF SERVICE

I do hereby certify that on this the 26th day of December, 1991 a true and accurate copy of the foregoing Defendant, U.S. Mineral Products Company's Responses to Plaintiffs' Request for Production and Interrogatories was delivered to counsel for plaintiff by certified mail, return receipt requested.



Charles J. Argento