

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF SAGINAW



THOMAS T. ABBOTT and
MARLENE ABBOTT, et al.,

Plaintiffs,

Master Case No. 94-003151-NP-5
Hon. Leopold P. Borrello

-v-

MALLINCKRODT GROUP, INC.,
f/k/a IMCERA GROUP, INC., f/k/a
INTERNATIONAL MINERALS AND
CHEMICAL CORPORATION, et al.,

THIS PLEADING APPLIES TO ALL
CASES FROM 94-003151-NP-5
THROUGH 94-004526-NP-5

Defendants.

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Lane A. Clack (P38835)
Attorneys for Plaintiffs

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CLARK HILL P.L.C.
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Attorneys for Mallinckrodt Group, Inc.

**ANSWERS AND OBJECTIONS OF MALLINCKRODT
GROUP, INC., ON BEHALF OF ITS FORMER E.J.
LAVINO DIVISION, TO PLAINTIFFS' INTERROGATORIES**

* * * * *

28. Does a patent exist or did a patent exist for any of the products listed in answer to Interrogatory No. 19? If so, for each such product, please state:

- A. The product name and number of its patent;
- B. The date same was issued; and,
- C. The product name and number of each patent application that is pending.

ANSWER:

Mallinckrodt will produce product specific information with respect to any of its products identified as a source of any plaintiff's asbestos exposure. To date, there has been no such identification.

29. Please state the name and address of each business entity from whom the Defendant, Defendant's predecessors or Defendant's subsidiaries have ever bought or received raw asbestos fiber, and as to each such transaction please state the following:

- A. The date of each sale or delivery of asbestos fiber, as well the amount received;
- B. The seller or provider of the asbestos fiber;
- C. The type of asbestos fiber sold or provided (e.g., amosite, chrysotile, or crocidolite);
- D. The use made of each sale or supply of asbestos fiber; and,
- E. Identify all documents relating to the purchase or receipt of raw asbestos fiber.

ANSWER:

Mallinckrodt objects to this Interrogatory as overly broad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence for the reasons stated in General Objection Nos. (b)-(d). Subject to and without waiving its objections, Mallinckrodt states that its former Lavino Division purchased asbestos for use in the manufacture of Plastic K-N. Asbestos used in the manufacture of that product may have been purchased from W.R. Grace & Company, but Mallinckrodt has not been able to confirm this. The asbestos used was chrysotile asbestos fiber and less than 1% by weight was in the finished product. Mallinckrodt has not located any purchase records.

30. Did Defendant, Defendant's predecessors or Defendant's subsidiaries ever market or distribute any asbestos-containing product manufactured in whole or part by someone else? If so, please state the following for each such product:

- A. The name and address of the manufacturer;
- B. The product's trade and brand name;

- A. Its generic or trade name;
- B. The years during which it was manufactured or sold;
- C. Its chemical composition (the identity and percentage by weight of all ingredients);
- D. The intended use of the product, including the temperature ranges for which the product was recommended;
- E. The form in which the product was shipped, including the size of the container;
- F. A description of the physical appearance of such product, including color and texture;
- G. A description of any logos, writing, impressions or identifying markings which appeared on each such product;
- H. Your basis for claiming that the product contained no free silica. (Identify any tests conducted of the silica dust exposures liberated during mixing, cutting or use of the product, or after its degeneration through use); and
- I. Your basis for claiming that the product contained no asbestos fiber.

ANSWER:

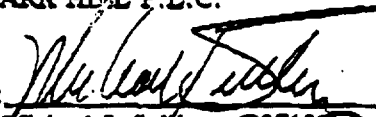
Mallinckrodt incorporates by reference its response to Interrogatory No. 158.

RESPONSE TO REQUEST FOR PRODUCTION

Mallinckrodt agrees to produce to Plaintiffs' counsel for inspection at a mutually agreeable place and time those documents which it specifically has agreed to produce in response to these Interrogatories.

Respectfully submitted,

CLARK HILL P.L.C.

By: 

Michael J. Sullivan (P37137)

Jeffrey A. Scheitz (P51951)

1600 First Federal Building

Detroit, MI 48226-1962

(313) 965-8300

Attorneys for Defendant, Mallinckrodt Group, Inc.

Dated: August 1, 1996

VERIFICATION

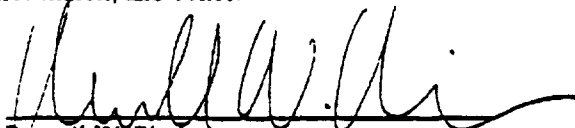
COUNTY OF ST. LOUIS)

) SS:

STATE OF MISSOURI)

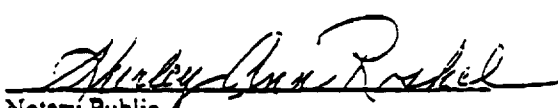
I, Russell W. Piraino, am Assistant General Counsel of Mallinckrodt Group Inc., and am duly authorized to execute, under oath and on behalf of Mallinckrodt, these Answers to Plaintiffs' Interrogatories to Defendants.

No one person has personal knowledge of the information requested by these interrogatories. The information set forth in these answers was collected by corporate personnel and other persons with knowledge of the facts or through a review of corporate records; such information is not necessarily within my personal knowledge. However, on behalf of the corporation, I solemnly affirm, under the penalties of perjury, that the foregoing answers are true and accurate to the best of my knowledge, information, and belief.


Russell W. Piraino

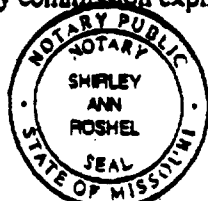
Sworn to before me and subscribed in my presence this 2nd day of

August, 1996.


Notary Public

My commission expires:

July 5, 2000



SHIRLEY ANN ROSHEL
NOTARY PUBLIC STATE OF MISSOURI
ST. CHARLES COUNTY
MY COMMISSION EXP. JULY 5, 2000

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