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1946-1956

September 14, 1976

Our File A8724

Dennis H. Markusson, Esquire
JOHNS-MANVILLE
P.O. Box 5723
Denver, CO 80217

Re: Sammie L. Gray, et al
vs.
Electric Boat, Div., et al

Dear Mr. Markusson:

The depositions of the personnel of General Dynamics were resumed in New London on Monday, September 13, 1976.

The following parties were represented by counsel in attendance:

Plaintiffs	Max Shafner Melvin Friedman
Johns Manville	Peter Schwartz
Bells Asbestos	Robert Ciulla
Eagle Picher	Mark Perkell
Cassiar's Asbestos	Coleman Casey and David Beers
Eastern Refractories	Robert Montstream
Westinghouse	Edward Houlihan, Jr.
UniRoyal	Carl Bestor
Raybestos Manhattan	James Coyne
Pittsburgh Corning	Neal Danaher
American Asbestos Textile Corporation	Thomas Shortell
H.K. Porter & Southern Asbestos	Joseph Franceski

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General Dynamics
William Everett,
Associate Div. Counsel

Hadleigh Howd
Electric Boat, Gen. Dynamics.

In addition to Mr. Everett, Messrs. Secor and Walden attended as representatives of General Dynamics.

Attorney Howd described the records which had been identified and segregated. These records are enumerated on the Response to Motion for Production, a copy of which is enclosed.

After considerable discussion of the records, arrangements were made for the examination and reproduction of the these records at General Dynamics by individual counsel. As liason officer, it was agreed that I would schedule the examinations. Upon completion of the examinations, the witnesses of General Dynamics will then be further deposed. In this regard, please advise if you and/or one of your associates wish to join with me in reviewing the records.

Mr. Walden was deposed for the limited purpose of determining the Vendors of asbestos and insulation material to General Dynamics.

Based upon the Travelling Purchase Requisitions, which he was careful to note were not all inclusive and that they dated back only to the late 1960's, Mr. Walden identified:

PRODUCT	SUPPLIER
cement, heat trarsfer	Lars Anderson*
tape asbestos	Anchor Packing Co.*
	Raybestos Manhattan
	Cummings Insulation
	Eastern Refractories
	Defense Apparel
	H.K. Porter

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cloth asbestos	Claremont Company*
	Cummings Insulation
insulation tape	N.W. Day Supply Company*
	Cummings Insulation
	Raybestos Manhattan
	Claremont
lagging tape	Alpha Associates
	Claremont Company*
	Eastern Refractories
	H.K. Porter
	Defense Apparel
millboard asbestos	Niantic Rubber Company*
	Dart & Bouge*
	Nicollet Industries*
tubular insulation (believed to Unicellar plastic)	Armstong Contracting*
	Cummings Insulation
	Rubbertex*
insulation pipe and covering	Reef Industries*
	Cummings Insulation
	Eastern Refractories
	Insulation Supply*
	Gustin Bacon*
	Johns-Manville (one entry)
block molded insulation	Cummings Insulation
	Reef Industries*
asbestos paper	Cummings Insulation
asbestos cement	Cummings Insulation
	Eastern Refractories
insulation felt	Cummings Insulation
	Reef Industries*
	Gustin Bacon*
	Insulation Supply*
glass cloth (believed to be fiberglas)	Henry and Frick*
	Balding Corticelli*
	J.P. Stevens**

insulation pipe	Cummings Insulation Insulation Supply* Gustin Bacon*
fire retardant installation vapor barrier coating	H.P Fuller Armstrong Contracting and Supply* Eastern Refractories
insulation sheet (believed to be plastic foam material)	Reef Industries* U.S. Rubber* UniRoyal
cement adhesive	Eastern Refractories Armstrong Contracting and Supply Company*
insulation cloth	Raybestos Manhattan Defense Apparel Eastern Refractories H.K. Porter Cummings Insulation
insulation blanket	Gustin and Bacon* Insulation Supply* Homans* Cummings Insulation
insulation pipe thermal	Gustin and Bacon* Insulation supply*

*Company not yet party to litigation
**Company dismissed without prejudice from litigation.

The principal direct supplier, based upon the number of entries, was Cummings Insulation. It is apparent that we should seek to identify the nature and end user of all asbestos related products which Johns-Manville has shipped to Cummings.

Based upon the Vendor files, which he was careful to note were not all inclusive in that they dated back to only late 1960, Mr. Walden identified the following as suppliers of asbestos and non-asbestos insulation products to General Dynamics, Electric Boat Division:

American Asbestos Textile Corporation
Norristown, PA

Anchor Packing Company*
New York, NY

Armstrong Cork*
Lancaster, PA

Hydraulic Research Company*
Burbank, CA

Certain--teed*
(believed to be fiberglas)
Carlyle, PA

Claremont Company*
Meriden, CT

Corning Glassworks
Wilmington, NC

Cummings Insulation Company
Meriden, CT

Defense Apparel
Hartford, CT

Eagle Picher
Cincinnati, OH

Eastern Refractories
Belmont, MA

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Flexitallic Gasket Company*
Camden, NJ

Garlock, Inc.*
Palmyra, NY

Marine Aerospace*
Andover, MA

Melrath Gasket Supply Company*
Philadelphia, PA

Niantic Rubber Company*
Cranston, RI

Nicollette Industries*
Ambler, PA

Owens Cornings Fiberglas**
East Hartford, CT

Penbek Oil Corporation*
Meriden, CT

H.K. Porter
St. Louis, MO

Raybestos Manhattan
Bridgeport, CT

Sepco Corporation
Birmingham, AL

J.P. Stevens**
New York, NY

Johns-Manville
Denver, CO

UniRoyal
Elkhart, IN

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Johnson Asbestos Corporation*
West Springfield, MA

Reef Industries (Shook & Fletcher)*
Jefferson, LA

Unarco
Waterbury, CT

Westinghouse
Worcester, MA

*Company not yet party to litigation
**Company dismissed without prejudice from litigation.

Attorney Howd made available copies of the current Vendor capability listing, a copy of which is enclosed. General Dynamics will furnish us copies of the commodity code so we can identify the products involved.

The listing only names those companies which have completed, in the last few years, questionnares solicited by General Dynamics. The listing does not identify all those companies which, at one time, have supplied products to General Dynamics.

You will note that this information is not apparently complete. For example, the Vendor capability listing shows Johns-Manville as not having made prior sales to Electric Boat. Pittsburgh Corning is nowhere listed; yet Mr. Secor, in his deposition, observed that "Unibestos", a product of Pittsburgh Corning, was a principal material used in the submarine refits.

Mr. Walden and Attorney Howd both indicated that Mr. Guillotte, the Superintendent of Lagging, would be able, on the basis of the personal recollection, to identify additional sources of the asbestos used by the Electric Boat Division of General Dynamics. In this regard, it was

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noted that Mr. Guillotte's service with Electric Boat extended over some 20-plus years.

After the deposition, I talked with plaintiffs' counsel and encouraged them to bring in the parties not previously named. No commitments were obtained.

Plaintiffs' counsel advised that, at least, three additional suits will soon be brought.

Plaintiffs' counsel was advised that they are presently awaiting the Department of Navy's direct--indirect rejection of claims filed in accordance with administrative procedures. It is the intention of plaintiffs' counsel, upon receipt of the anticipated rejection, to institute litigation against the Department of Navy, under the provisions of the United States Tort Claims Act (in the District Court for the District of Connecticut).

I will undertake the review of the records in Boston. In this regard, please advise if you and/or one of your associates wish to join with me for this purpose.

Very truly yours,

PETER C. SCHWARTZ

PCS:dbm
Enc.
cc: Mr. Richard Heafey
Alexander Urkovic, Esquire