

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

LAURA A. NIZINSKI, Executor of the
Estate of LEONARD R NIZINSKI,
Deceased, and LAURA A. NIZINSKI, in
her own right,

CIVIL DIVISION

Plaintiff,

No. GD 03-9848

vs.

PNEUMO ABEX CORPORATION, et al.,

Defendants.

PLAINTIFF'S EXHIBIT

BDO-1

**ANSWERS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES DIRECTED TO
DEFENDANT BONDO CORPORATION**

AND NOW, comes the Defendant, Bondo Corporation, by and through its counsel, Peter
D. Giglione, Esquire and Marshall, Dennehey, Warner, Coleman & Goggin, and files the within
Answers to Plaintiffs' First Set of Interrogatories as follows:

1. Identify all of Bondo Corporation's suppliers of talc from 1960 to 1990.

**ANSWER: Objection. This Interrogatory is overly broad, unduly burdensome,
and not likely to lead to the discovery of relevant evidence. Without waiver of said
objections, Bondo Corporation purchased talc from the following companies: Engelhart
Corporation; Eastern Magnesium Talc; Vertal Corporation, also known as Vermont Talc,
Inc.; Cyprus Minerals; Specialty Minerals; Luzenac America; and Whittaker, Clark and
Daniels. Bondo Corporation never purchased talc from any other companies.**

Respectfully Submitted,

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN



Peter D. Giglione, Esquire

Attorneys for the Defendant
Bondo Corporation

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EXHIBIT
WCD-365