

8114174

Civil Action No. 74-W-524

Defendants.

DEFENDANT UNARCO, INC.'S
ANSWERS TO FIRST SET OF
INTERROGATORIES

1. Answers are given only in relation to the Unarco's asbestos operations. It is assumed that answers relative to manufacture of other items are beyond plaintiffs' area of inquiry as they would not be pertinent or relevant to the subject matter of the lawsuit. If Unarco's interpretation of the scope of plaintiffs' interrogatories is not correct, then Unarco hereby objects to all interrogatories, the scope of which extends to manufacture of products other than asbestos.
2. Unarco has not been involved in the asbestos business for several years. Its files, such as it may still have, relative to asbestos operations are inactive or closed. Unarco has not, at this time and without either plaintiffs' agreement to pay all reasonable expenses to be incurred, made any search of such files. While it cannot now be determined what expense may be involved in searching for or through files, it appears that such would involve substantial time and expense which may be entirely without productive results. To the extent that plaintiffs' interrogatories intend to call for such a search defendant Unarco objects to them.
3. Unarco, we believe, may have been involved in litigation in the past, wherein the issues may have been somewhat similar to those involved herein. At the present time counsel is attempting to determine whether the foregoing statement is factual and, if so, whether discovery of

matters similar to those now inquired into was conducted and, if so, what was learned by counsel in that case or cases. If there has been such litigation and if the interrogatories filed therein were similar and if enough information was developed in such case to answer the interrogatories and if present counsel is able to obtain such information, it may be possible to provide further response to plaintiffs' interrogatories without incurring the substantial expense referred to above.

ANSWERS:

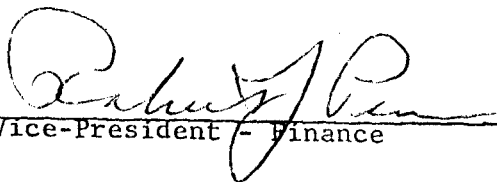
A. Robert J. Penn - Vice-President -- Finance

B. No, but see paragraphs 1, 2, and 3 above. In view of the fact Unarco was not in the asbestos business during all of the time referred to the numbered paragraphs are deemed inapplicable and cannot be answered further at this time.

C. See paragraphs 1, 2 and 3 above.

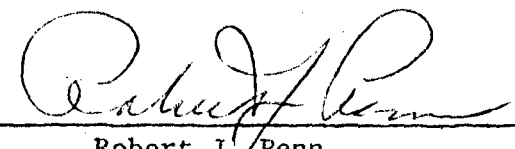
D. See paragraphs 1, 2, and 3 above.

UNARCO INDUSTRIES, INC.

By 
Vice-President - Finance

STATE OF ILLINOIS)
) ss.
COUNTY OF Cook)

ROBERT J. PENN, being first duly sworn upon his oath, deposes and says that he is Vice-President - Finance, of Unarco Industries, Inc.; that he is authorized to make the foregoing answers for and on behalf of Unarco Industries, Inc.; and that to the best of his information and belief said answers are true.


Robert J. Penn

1974. Subscribed and sworn to before me this 31st day of July,
Witness my hand and official seal.


Notary Public

My commission expires:

May 18, 1977

I hereby certify that I have this 14th day of August,
19774, served the foregoing Answers to Interrogatories
upon all counsel of record by placing
true copies in the United States Mail, postage prepaid, addressed
as follows:

WILLIAMS, TRINE & GREENSTEIN, P.C.

William A. Trine, Esq.

J. Conard Metcalf, Esq.

1405 Arapahoe Avenue

Boulder, Colorado 80302

R. JERRY RUSSELL, ESQ.

Garden Office Center

Broomfield, Colorado 80020

Attorneys for Plaintiffs

WOOD, RIS & HAMES, P.C.

William K. Ris, Esq.

900 Denver Club Building

Denver, Colorado 80202

Attorneys for Johns-Manville Products Corporation

DOSH, DeMOULIN, ANDERSON & CAMPBELL

Jack Kent Anderson, Esq.

6780 East Hampden Avenue

Denver, Colorado 80222

Attorneys for Eagle-Picher Industries, Inc.

TILLY AND GRAVES

James L. Tilly, Esq.

Capitol Life Center

Denver, Colorado 80203

Attorneys for Armstrong Cork Company

SHELDON, BAYER, McLEAN & GLASMAN

Richard McLean, Esq.

American National Bank Building

Denver, Colorado 80202

Attorneys for Owens-Corning Fiberglass Corporation

KENNETH C. GROVES, ESQ.

1000 Capitol Life Center

Denver, Colorado 80203

Attorney for Fibreboard Corporation

MADDEN & STRATE, P.C.

William Madden, Esq.

2201 Kipling Street

Denver, Colorado 80215

Attorneys for Combustion Engineering, Inc.

ZARLENGO, MOTT & ZARLENGO

American National Bank Building

Denver, Colorado 80202

Attorneys for Standard Asbestos Manufacturing & Insulating Company

WHITE & STEELE

John Clough, Esq.

1660 Lincoln Tower Building

1660 Lincoln Street

Denver, Colorado 80203

WYATT AND SOMMERMEYER
870 Savings Building
Fort Collins, Colorado 80521
Attorneys for Pittsburgh Corning Corporation

DAVIS, GRAHAM & STUBBS
Robert H. Harry, Esq.
John F. Welborn, Esq.
1200 American National Bank Building
Denver, Colorado 80202
Attorneys for Ruberoid Company

JAMES E. ELLIOTT, JR., ESQ.
1050 Seventeenth Street
Denver, Colorado 80202
Attorney for A. H. Bennett Company


A handwritten signature in cursive script, reading "R. J. Vaira", is written over a horizontal line.

8114/74

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Civil Action No. 74-W-524

HERBERT EDWIN GIBSON and	)	
FURL D. GIBSON,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	DEFENDANT UNARCO, INC.'S
	)	ANSWERS TO SECOND SET OF
	)	INTERROGATORIES
JOHNS-MANVILLE PRODUCTS	)	
CORPORATION, a Delaware	)	
corporation, et al.,	)	
	)	
Defendants.	)	

COMES NOW Defendant Unarco and answers the Second
Set of Interrogatories as follows:

Note: The answers given by defendant Unarco, Inc. are subject to
the following:

1. Answers are given only in relation to the Unarco's asbestos operations. It is assumed that answers relative to manufacture of other items are beyond plaintiffs' area of inquiry as they would not be pertinent or relevant to the subject matter of the lawsuit. If Unarco's interpretation of the scope of plaintiffs' interrogatories is not correct, then Unarco hereby objects to all interrogatories; the scope of which extends to manufacture of products other than asbestos.
2. Unarco has not been involved in the asbestos business for several years. Its files, such as it may still have, relative to asbestos operations are inactive or closed. Unarco has not, at this time and without either plaintiffs' agreement to pay all reasonable expenses to be incurred, made any search of such files. While it cannot now be determined what expense may be involved in searching for or through files, it appears that such would involve substantial time and expense which may be entirely without productive results. To the extent that plaintiffs' interrogatories intend to call for such a search defendant Unarco objects to them.
3. Unarco, we believe, may have been involved in litigation in the past, wherein the issues may have been somewhat similar to those involved herein. At the present time counsel is attempting to determine whether the foregoing statement is factual and, if so, whether discovery of

matters similar to those now inquired into was conducted and, if so, what was learned by counsel in that case or cases. If there has been such litigation and if the interrogatories filed therein were similar and if enough information was developed in such case to answer the interrogatories and if present counsel is able to obtain such information, it may be possible to provide further response to plaintiffs' interrogatories without incurring the substantial expense referred to above.

ANSWERS:

1. Robert J. Penn - Vice-President -- Finance

The defendant answers the following interrogatories only with respect to asbestos in order to avoid dealing with irrelevancies.

2. No.
3. No.
4. None presently known which deal specifically with the matter referred to, however please see introductory Notes 1, 2, and 3 above.
5. Not presently known, however please see introductory Notes 1, 2, and 3 above.
6. Not presently known, however please see introductory Notes 1, 2, and 3 above.
7. Not presently known, however please see introductory Notes 1, 2, and 3 above.
8. Probably not but see introductory Notes 1, 2, and 3 above.
9. Probably not but see introductory Notes 1, 2, and 3 above.
10. Probably not but see introductory Notes 1, 2, and 3 above.
11. Probably not but see introductory Notes 1, 2, and 3 above.
12. Probably not but see introductory Notes 1, 2, and 3 above.
13. Probably not. Please see introductory Notes 1, 2, and 3 above.
14. If you refer to physicians engaged to consult regarding manufacturing standards, probably none.
15. None so far as known at this time.
16. Unable to answer at this time because of the long lapse of time since involvement in asbestos manufacture. See introductory

Notes 1, 2, and 3 above.

17. Unknown at this time. See introductory Notes 1, 2, and 3 above.

18. Not applicable.

19. Not known at this time. See introductory Notes 1, 2, and 3 above.

20. Not known at this time. See introductory Notes 1, 2, and 3 above.

21. Not at this time. See introductory Notes 1, 2, and 3 above.

22. Not known at this time. See introductory Notes 1, 2, and 3 above.

23. Not known at this time but see introductory Notes 1, 2, and 3 above.

24. (a) Unknown at this time. See introductory Notes 1, 2, and 3 above. We are attempting to obtain further information and if obtained plan to answer further.

25. Unknown at this time. See introductory Notes 1, 2, and 3 above.

26. No.

27. Unknown. Records not available. See introductory Notes 1, 2 and 3 above.

28. Not known.

29. Not so far as known.

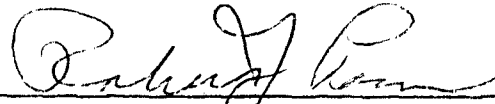
30. Not so far as known.

31. Not so far as known.

32. Not so far as known.

UNARCO INDUSTRIES, INC.

By


Vice-President - Finance

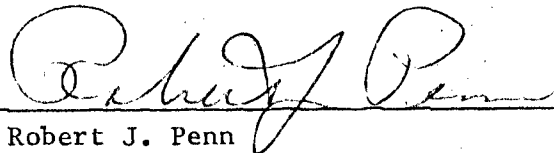
STATE OF ILLINOIS)

COUNTY OF Cook)

ss.

ROBERT J. PENN, being first duly sworn upon his oath, deposes

and says that he is Vice-President - Finance, of Unarco Industries, Inc.; that he is authorized to make the foregoing answers for and on behalf of Unarco Industries, Inc.; and that to the best of his information and belief said answers are true.

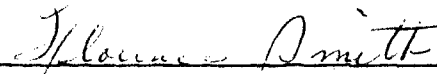

Robert J. Penn

Subscribed and sworn to before me this 3rd day of
July, 1974.

Witness my hand and official seal.

My commission expires:

May 18, 1977


Notary Public

I hereby certify that I have this 14th day of August,
19774, served the foregoing Answers to Interrogatories
upon all counsel of record by placing
true copies in the United States Mail, postage prepaid, addressed
as follows:

WILLIAMS, TRINE & GREENSTEIN, P.C.

William A. Trine, Esq.

J. Conard Metcalf, Esq.

1405 Arapahoe Avenue

Boulder, Colorado 80302

R. JERRY RUSSELL, ESQ.

Garden Office Center

Broomfield, Colorado 80020

Attorneys for Plaintiffs

WOOD, RIS & HAMES, P.C.

William K. Ris, Esq.

900 Denver Club Building

Denver, Colorado 80202

Attorneys for Johns-Manville Products Corporation

DOSH, DeMOULIN, ANDERSON & CAMPBELL

Jack Kent Anderson, Esq.

6780 East Hampden Avenue

Denver, Colorado 80222

Attorneys for Eagle-Picher Industries, Inc.

TILLY AND GRAVES

James L. Tilly, Esq.

Capitol Life Center

Denver, Colorado 80203

Attorneys for Armstrong Cork Company

SHELDON, BAYER, McLEAN & GLASMAN

Richard McLean, Esq.

American National Bank Building

Denver, Colorado 80202

Attorneys for Owens-Corning Fiberglass Corporation

KENNETH C. GROVES, ESQ.

1000 Capitol Life Center

Denver, Colorado 80203

Attorney for Fibreboard Corporation

MADDEN & STRATE, P.C.

William Madden, Esq.

2201 Kipling Street

Denver, Colorado 80215

Attorneys for Combustion Engineering, Inc.

ZARLENGO, MOTT & ZARLENGO

American National Bank Building

Denver, Colorado 80202

Attorneys for Standard Asbestos Manufacturing & Insulating Company

WHITE & STEELE

John Clough, Esq.

1660 Lincoln Tower Building

1660 Lincoln Street

Denver, Colorado 80203

WYATT AND SOMMERMEYER
870 Savings Building
Fort Collins, Colorado 80521
Attorneys for Pittsburgh Corning Corporation

DAVIS, GRAHAM & STUBBS
Robert H. Harry, Esq.
John F. Welborn, Esq.
1200 American National Bank Building
Denver, Colorado 80202
Attorneys for Ruberoid Company

JAMES E. ELLIOTT, JR., ESQ.
1050 Seventeenth Street
Denver, Colorado 80202
Attorney for A. H. Bennett Company

Ripie Vaira

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLORADO

FOR THE DISTRICT OF COLORADO

Civil Action No. 74-W-524

HERBERT EDWIN GIBSON and
FURL D. GIBSON,

FURL D. GIBSON,

Plaintiffs,

VS.

JOHNS-MANVILLE PRODUCTS
CORPORATION, a Delaware
corporation, et al.,

CORPORATION, a Delaware
corporation , et al.,

corporation , et al.,

Defendants.

DEFENDANT UNARCO, INC.'S
ANSWERS TO THIRD SET OF
INTERROGATORIES

ANSWERS TO THIRD SET OF
INTERROGATORIES

INTERROGATORIES

COMES NOW Defendant Unarco, Inc. and answers the Third Set of Interrogatories as follows:

By

Vice-President / Finance

STATE OF ILLINOIS

SS.

COUNTY OF Cook

ROBERT H. PENN, being first duly sworn upon his oath, deposes and says that he is Vice-President - Finance, of Unarco Industries, Inc.; that he is authorized to make the foregoing answers for and on behalf of Unarco Industries, Inc.; and that to the best of his information and belief said answers are true.

Robert J. Penn

1974.

Subscribed and sworn to before me this 31st day of July,

Witness my hand and official seal.

My commission expires: MAY 18, 1977

Notary Public

I hereby certify that I have this 14th day of August,
19774, served the foregoing Answers to Interrogatories
upon all counsel of record by placing
true copies in the United States Mail, postage prepaid, addressed
as follows:

WILLIAMS, TRINE & GREENSTEIN, P.C.

William A. Trine, Esq.
J. Conard Metcalf, Esq.
1405 Arapahoe Avenue
Boulder, Colorado 80302

R. JERRY RUSSELL, ESQ.

Garden Office Center
Broomfield, Colorado 80020
Attorneys for Plaintiffs

WOOD, RIS & HAMES, P.C.

William K. Ris, Esq.
900 Denver Club Building
Denver, Colorado 80202
Attorneys for Johns-Manville Products Corporation

DOSH, DeMOULIN, ANDERSON & CAMPBELL

Jack Kent Anderson, Esq.
6780 East Hampden Avenue
Denver, Colorado 80222
Attorneys for Eagle-Picher Industries, Inc.

TILLY AND GRAVES

James L. Tilly, Esq.
Capitol Life Center
Denver, Colorado 80203
Attorneys for Armstrong Cork Company

SHELDON, BAYER, McLEAN & GLASMAN

Richard McLean, Esq.
American National Bank Building
Denver, Colorado 80202
Attorneys for Owens-Corning Fiberglass Corporation

KENNETH C. GROVES, ESQ.

1000 Capitol Life Center
Denver, Colorado 80203
Attorney for Fibreboard Corporation

MADDEN & STRATE, P.C.

William Madden, Esq.
2201 Kipling Street
Denver, Colorado 80215
Attorneys for Combustion Engineering, Inc.

ZARLENGO, MOTT & ZARLENGO

American National Bank Building
Denver, Colorado 80202
Attorneys for Standard Asbestos Manufacturing & Insulating Company

WHITE & STEELE

John Clough, Esq.
1660 Lincoln Tower Building
1660 Lincoln Street
Denver, Colorado 80203

WYATT AND SOMMERMEYER
870 Savings Building
Fort Collins, Colorado 80521
Attorneys for Pittsburgh Corning Corporation

DAVIS, GRAHAM & STUBBS
Robert H. Harry, Esq.
John F. Welborn, Esq.
1200 American National Bank Building
Denver, Colorado 80202
Attorneys for Ruberoid Company

JAMES E. ELLIOTT, JR., ESQ.
1050 Seventeenth Street
Denver, Colorado 80202
Attorney for A. H. Bennett Company

Ripie Vaira

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF BOULDER
STATE OF COLORADO
Civil Action No. 76-1503-1

HAROLD D. TUTTLE,	)	
	)	
Plaintiff,	)	DEFENDANT UNARCO INDUSTRIES,
vs.	)	INC.'S ANSWERS TO FIRST SET
	)	OF INTERROGATORIES
JOHNS-MANVILLE PRODUCTS	)	
CORPORATION, a Delaware	)	
corporation, et al.,	)	
	)	
Defendants.	)	

COMES NOW Defendant Unarco and appearing specially for this purpose and without waiver of its special appearance answers the Interrogatories as follows:

Note: The answers given by Defendant Unarco, Inc. are subject to the following:

1. Answers are given only in relation to the Unarco's asbestos operations. It is assumed that answers relative to manufacture of other items are beyond plaintiff's area of inquiry as they would not be pertinent or relevant to the subject matter of the lawsuit. If Unarco's interpretation of the scope of plaintiff's interrogatories is not correct, then Unarco hereby objects to all interrogatories, the scope of which extends to manufacture of products other than asbestos.
2. Unarco has not been involved in the asbestos business for several years. Its files, such as it may still have, relative to asbestos operations are inactive or closed. Unarco has not, at this time and without either plaintiff's agreement to pay all reasonable expenses to be incurred, made any search of such files. While it cannot now be determined what expense may be involved in searching for or through files, it appears that such would involved substantial time and expense which may be entirely without productive results. To the extent that plaintiff's interrogatories intend to call for such a search defendant Unarco objects to them.

3. Unarco, we believe, may have been involved in litigation in the past, wherein the issues may have been somewhat similar to those involved herein. At the present time counsel is attempting to determine whether the foregoing statement is factual and, if so, whether discovery of matters similar to those now inquired into was conducted and, if so, what was learned by counsel in that case or cases. If there has been such litigation and if the interrogatories filed therein were similar and if enough information was developed in such case to answer the interrogatories and if present counsel is able to obtain such information, it may be possible to provide further response to plaintiff's interrogatories without incurring the substantial expense referred to above.

ANSWERS:

A. Robert J. Penn - Vice-President -- Finance

B. No, but see paragraphs 1, 2, and 3 above. In view of the fact Unarco was not in the asbestos business during all of the time referred to the numbered paragraphs are deemed inapplicable and cannot be answered further at this time.

C. See paragraphs 1, 2 and 3 above.

D. See paragraphs 1, 2, and 3 above.

UNARCO INDUSTRIES, INC.

BY

Robert J. Penn
Vice-President - Finance

STATE OF ILLINOIS)

COUNTY OF Cook)

ss.

ROBERT J. PENN, being first duly sworn upon his oath, deposes and says that he is Vice-President - Finance, of Unarco Industries, Inc.; that he is authorized to make the foregoing answers for and on behalf of Unarco Industries, Inc.; and that to the best of his information and belief said answers are true.

Address of Defendant:
332 S. Michigan Ave.
Chicago, IL 60604

Robert J. Penn
Robert J. Penn

1976.

Subscribed and sworn to before me this 7th day of July,
Witness my hand and official seal.

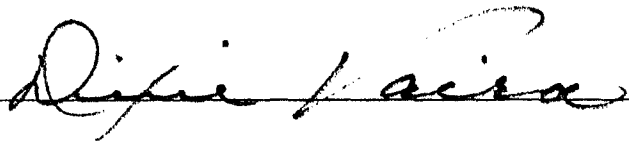
My commission expires:

My Commission Expires June 16th, 1979

I hereby certify that I have this 12th day of July, 1976, served true copies of the foregoing Answers to Interrogatories upon all counsel of record by placing said true copies in the U.S. Mail, postage prepaid, addressed as follows:

J. CONARD METCALF, ESQ.
WILLIAM A. TRINE, ESQ.
Williams, Trine and Greenstein, P.C.
1405 Arapahoe Avenue
Boulder, Colorado 80302

WILLIAM K. RIS, ESQ.
Wood, Ris & Hames, P.C.
900 Denver Club Building
Denver, Colorado 80202

A handwritten signature in cursive script, appearing to read "Dixie P. A. A. A.", is written over a horizontal line.

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF BOULDER
STATE OF COLORADO
Civil Action No. 76-1503-1

HAROLD D. TUTTLE,	)	
	)	
Plaintiff,	)	
vs.	)	DEFENDANT UNARCO INDUSTRIES,
	)	INC.'S ANSWER TO SECOND SET
JOHNS-MANVILLE PRODUCTS	)	OF INTERROGATORIES
CORPORATION, a Delaware	)	
corporation, et al.,	)	
	)	
Defendants.	)	

COMES NOW Defendant Unarco and appearing specially for this purpose and without waiver of its special appearance answers the Interrogatories as follows:

Note: The answers given by Defendant Unarco, Inc. are subject to the following:

1. Answers are given only in relation to the Unarco's asbestos operations. It is assumed that answers relative to manufacture of other items are beyond plaintiff's area of inquiry as they would not be pertinent or relative to the subject matter of the lawsuit. If Unarco's interpretation of the scope of plaintiff's interrogatories is not correct, then Unarco hereby objects to all interrogatories, the scope of which extends to manufacture of products other than asbestos.
2. Unarco has not been involved in the asbestos business for several years. Its files, such as it may still have, relative to asbestos operations are inactive or closed. Unarco has not, at this time and without either plaintiff's agreement to pay all reasonable expenses to be incurred, made any search of such files. While it cannot now be determined what expense may be involved in searching for or through files, it appears that such would involve substantial time and expense which may be entirely without productive results. To the extent that plaintiff's interrogatories intend to call for such a search defendant Unarco objects to them.

3. Unarco, we believe, may have been involved in litigation in the past, wherein the issues may have been somewhat similar to those involved herein. At the present time counsel is attempting to determine whether the foregoing statement is factual and, if so, whether discovery of matters similar to those now inquired into was conducted and, if so, what was learned by counsel in that case or cases. If there has been such litigation and if the interrogatories filed therein were similar and if enough information was developed in such case to answer the interrogatories and if present counsel is able to obtain such information, it may be possible to provide further response to plaintiff's interrogatories without incurring the substantial expense referred to above.

ANSWERS:

1. Robert J. Penn - Vice-President -- Finance

The defendant answers the following interrogatories only with respect to asbestos in order to avoid dealing with irrelevancies.

2. No.

3. No.

4. None presently known which deal specifically with the matter referred to, however please see introductory Notes 1, 2 and 3 above.

5. Not presently known, however please see introductory Notes 1, 2 and 3 above.

6. Not presently known, however please see introductory Notes 1, 2 and 3 above.

7. Not presently known, however please see introductory Notes 1, 2 and 3 above.

8. Probably not but see introductory Notes 1, 2 and 3 above.

9. Probably not but see introductory Notes 1, 2 and 3 above.

10. Probably not but see introductory Notes 1, 2 and 3 above.

11. Probably not but see introductory Notes 1, 2 and 3 above.

12. Probably not but see introductory Notes 1, 2 and 3

above.

13. Probably not. Please see introductory Notes 1, 2 and 3 above.

14. If you refer to physicians engaged to consult regarding manufacturing standards, probably none.

15. None so far as known at this time.

16. Unable to answer at this time because of the long lapse of time since involvement in asbestos manufacture. See introductory Notes 1, 2 and 3 above.

17. Unknown at this time. See introductory Notes 1, 2 and 3 above.

18. Not applicable.

19. Not known at this time. See introductory Notes 1, 2 and 3 above.

20. Not known at this time. See introductory Notes 1, 2 and 3 above.

21. Not at this time. See introductory Notes 1, 2, and 3 above.

22. Not known at this time. See introductory Notes 1, 2 and 3 above.

23. Not known at this time but see introductory Notes 1, 2 and 3 above.

24. (a) Unknown at this time. See introductory Notes 1, 2 and 3 above. We are attempting to obtain further information and if obtained plan to answer further.

25. Unknown at this time. See introductory Notes 1, 2 and 3 above.

26. No.

27. Unknown. Records not available. See introductory Notes 1, 2 and 3 above.

28. Not known.

29. Not so far as known.
30. Not so far as known.
31. Not so far as known.
32. Not so far as known.
33. Not known at this time. See introductory Notes 1, 2 and 3 above.
34. Not known at this time. See introductory Notes 1, 2 and 3 above.
35. Not known at this time. See introductory Notes 1, 2 and 3 above.
36. Not known at this time. See introductory Notes 1, 2 and 3 above.

UNARCO INDUSTRIES, INC.

By *Robert J. Penn*
Vice-President - Finance

Address of Defendant:
Unarco Industries, Inc.:
332 South Michigan Avenue
Chicago, IL 60604

STATE OF ILLINOIS)
COUNTY OF Cook) ss.

ROBERT J. PENN, being first duly sworn upon his oath, deposes and says that he is Vice-President - Finance, of Unarco Industries, Inc.; that he is authorized to make the foregoing answers for and on behalf of Unarco Industries, Inc.; and that to the best of his information and belief said answers are true.

Robert J. Penn
Robert J. Penn

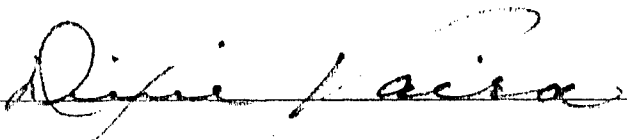
Subscribed and sworn to before me this 7th day of July, 1976. Witness my hand and official seal. My commission expires: My Commission Expires June 16th, 1979.

Robert J. Penn
Notary Public

I hereby certify that I have this 12th day of July, 1976, served true copies of the foregoing Answers to Interrogatories upon all counsel of record by placing said true copies in the U.S. Mail, postage prepaid, addressed as follows:

J. CONARD METCALF, ESQ.
WILLIAM A. TRINE, ESQ.
Williams, Trine and Greenstein, P.C.
1405 Arapahoe Avenue
Boulder, Colorado 80302

WILLIAM K. RIS, ESQ.
Wood, Ris & Hames, P.C.
900 Denver Club Building
Denver, Colorado 80202



IN THE DISTRICT COURT
 IN AND FOR THE COUNTY OF BOULDER
 STATE OF COLORADO
 Civil Action No. 76-1503-1

HAROLD D. TUTTLE,	)	
	)	
Plaintiff,	)	DEFENDANT UNARCO INDUSTRIES,
vs.	)	INC.'S ANSWERS TO THIRD SET OF
	)	INTERROGATORIES
JOHNS-MANVILLE PRODUCTS	)	
CORPORATION, a Delaware	)	
corporation, et al.,	)	
	)	
Defendants.	)	

COMES NOW Defendant Unarco and appearing specially for this purpose and without waiver of its special appearance answers the Interrogatories as follows:

1. Not applicable. Not in asbestos business.
2. Not in the asbestos business. If the interrogatory seeks information concerning other businesses, it is objected to as irrelevant and beyond the scope of permissible inquiry.
3. See answers 1 and 2.

UNARCO INDUSTRIES, INC

By

Robert J. Penn
 Vice-President - Finance

Address of Defendant:
 Unarco Industries, Inc.:
 332 South Michigan Avenue
 Chicago, IL 60604

STATE OF ILLINOIS)
)
 COUNTY OF Clark) ss.

ROBERT J. PENN, being first duly sworn upon his oath, deposes and says that he is Vice-President - Finance, of Unarco Industries, Inc.; that he is authorized to make the foregoing answers for and on behalf of Unarco Industries, Inc.; and that to the best of his information and belief said answers are true.

Robert J. Penn
 Robert J. Penn

Subscribed and sworn to before me this 7th day of July, 1976. Witness my hand and official seal. My Commission Expires: June 10th, 1979

Robert J. Penn
 Notary Public

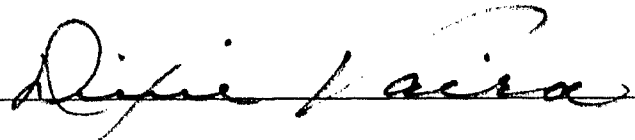
cc: client

9/9/76

I hereby certify that I have this 12th day of July, 1976, served true copies of the foregoing Answers to Interrogatories upon all counsel of record by placing said true copies in the U.S. Mail, postage prepaid, addressed as follows:

J. CONARD METCALF, ESQ.
WILLIAM A. TRINE, ESQ.
Williams, Trine and Greenstein, P.C.
1405 Arapahoe Avenue
Boulder, Colorado 80302

WILLIAM K. RIS, ESQ.
Wood, Ris & Hames, P.C.
900 Denver Club Building
Denver, Colorado 80202



IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF BOULDER
STATE OF COLORADO
Civil Action No. 77-0609-1

GEORGE L. SCHNEIDER, and his wife,
KATE SCHNEIDER,

Plaintiffs,

v.

JOHNS-MANVILLE PRODUCTS CORPORATION,
a Delaware corporation, UNARCO
INDUSTRIES, INC., an Illinois corp-
oration, G.A.F. CORPORATION, a Delaware
corporation, STANDARD ASBESTOS MANU-
FACTURING AND INSULATING COMPANY, a
Missouri corporation, OWENS-CORNING
FIBERGLAS CORPROATION, a Delaware
corporation, PITTSBURGH CORNING
CORPORATION, a Pennsylvania corporation,
THE CELOTEX CORPORATION, a Delaware
corporation, CERTAIN--TEED PRODUCTS
CORPORATION, a Maryland corporation,
NICOLET INDUSTRIES, a Pennsylvania
corproation, and 48 INSULATION, INC.,
an Illinois corporation, FIBREBOARD
CORPORATION, a Delaware corporation,
and EAGLE-PICHER INDUSTRIES, an Ohio
corporation, RILEY STOKER CORPORATION,
a Massachusetts corporation,

Defendants.

UNARCO'S
ANSWERS TO
FIRST SET OF
INTERROGATORIES

COMES NOW defendant UNARCO INDUSTRIES, INC., by and through
its attorneys, Weller, Friedrich, Hickisch and Hazlitt, and answers
plaintiffs' interrogatories as follows:

Note: The answers given by this defendant are subject to the
following:

1. Answers are given only in relation to Unarco's asbestos
operations. It is assumed that answers relative to
manufacture of other items are beyond plaintiffs' area
of inquiry as they would not be relevant or designed to
lead to the discovery of relevant information. If
Unarco's interpretation of the scope of plaintiffs'
interrogatories is not correct, then Unarco hereby
objects to all such interrogatories, the scope of which
extends to manufacture of products other than asbestos.
2. Unarco has not been involved in the asbestos business for
several years. Its files have been disposed of by either
giving them to the purchasers of the various segments of
its former asbestos business or were destroyed after the
sale of the last asbestos plant in 1970.

3. Unarco has been involved in litigation wherein the issues have been somewhat similar to those involved here. Counsel is now attempting to determine whether discovery of matters similar to those now inquired into was conducted and, if so, what was learned by counsel in that case or cases. If the discovery filed therein was similar and if enough information was developed in such case to respond to the discovery and if present counsel is able to obtain such information, it may be possible to provide further responses to plaintiffs' interrogatories without incurring substantial expense.

QA: Please state the official title or position in defendant corporation of the person or persons answering these Interrogatories and signing the same.

AA: Robert J. Penn, Vice President - Finance.

QB1: For that period of time commencing in the year 1951 through 1976 inclusive, please answer the below interrogatories: Did your company have distributorships or dealers in the State of Colorado to which your insulation or other products were distributed?

A1: Unable to answer. See Introductory Notes 1, 2, and 3.

Q2: Did you have a business relationship with any person or business in the State of Colorado for the purpose of distributing your products? If so, state:

(a) Please state the name and address of all persons or businesses in the State of Colorado with which you had a business relationship, whether direct or indirect.

(b) How long have you had a business relationship with each such person or business?

(c) What is the purpose of the business relationship?

(d) Are your products eventually sold to the general public in the State of Colorado through persons or businesses in the State of Colorado with which you have a business relationship?

A2: See Introductory Notes 1, 2, and 3.

Q3: Did your company promote the sales of your products through the advertising media in the State of Colorado? If so, state:

(a) Please state the type media used for such advertising, i.e., television, magazines, newspapers, etc.

(b) Are any national television networks used for

publicizing your products by your company? If so, please state which programs are sponsored by your products and on which networks.

(c) Did your company sponsor advertisement for the sale of your products in any nationally distributed magazines? If so, which magazine?

(d) Did your company sponsor any other advertising in any news media on a national scale? If so, please state and describe the nature of such advertising.

(e) Had your company sponsored any advertising in any news media in the State of Colorado including newspapers, magazines, etc., distributed in Colorado, local television programming or any national television programs that would be received in Colorado? If so, please describe the nature of such advertising.

(f) If your company had sponsored any advertising as set forth in any of the above paragraphs, please state whether this advertising or comparable advertising was being used or sponsored by your company for the sale of your products during the year 1976 and prior thereto.

A3: See Introductory Notes 1, 2, and 3.

Q4: Did your company keep any books or records on the number of your products distributed to the State of Colorado and sold in the State of Colorado? If so, how long had such books or records been kept and where are they located?

A4: See Introductory Notes 1, 2 and 3.

Q5: Did your company keep any books or records on the quantity of insulation distributed to the State of Colorado and/or sold or used in the State of Colorado? If so, state:

(a) How long had such books or records been kept and where are they located?

(b) Did such records reflect the name of the ultimate purchasers of insulation in Colorado?

(c) Did such records reflect the dates and quantities of

insulation purchased and by whom?

(d) Did such records reflect the name and address of each purchaser or of any purchasers of insulation?

A5: See Introductory Notes 1, 2, and 3.

Q6: Did your company keep any books or records on the quantity, number or amount of your products distributed to the State of Colorado and sold in the State of Colorado which contain or are manufactured with asbestos, and which products would include products other than insulation? If so, state:

(a) How long had such books or records been kept and where are they located?

(b) Did such records reflect the names of the ultimate purchasers of such products in Colorado?

(c) Did such records reflect the dates and quantities of such products purchased and by whom?

(d) Did such records reflect the name and address of each purchaser or of any purchasers of such products?

A6: See Introductory Notes 1, 2, and 3.

Q7: Did your company distribute any information on the maintenance of your products? If so, state:

(a) What use is made of such information on maintenance of your products?

(b) Is any of this information distributed to any persons or businesses in the State of Colorado?

A7: See Introductory Notes 1, 2, and 3.

Q8: Is your company the insured on a liability insurance policy that would cover the incident referred to in the Complaint? If so, set forth in detail the name or names of insurance companies involved; the policy number; the name of the insured; the amount of coverage provided by each such policy; and whether there is other insurance which would be considered secondary coverage, umbrella coverage, reinsurance, or other policies that take effect only if the primary coverage is used in full.

A8: Defendant is unable to fully and accurately respond to the interrogatory until plaintiffs specifically state the time, place, and specific acts of which complaint is made against this defendant. Until that time, defendant is unable to fully determine what law governs, what acts would or would not be covered, what policy periods are involved, and what other coverage may be available. However, defendant can state that it has had coverage supplied by the following insurers in the following amounts at certain periods of time:

Zurich America	100,000/300,000	6/58-1/61
Zurich America	500,000/500,000	1/61-11/64
Bituminous Casualty	500,000/500,000	11/64-1970
Continental Insurance	500,000/500,000	11/70-1976
Continental Insurance	2,000,000/1,000,000	1977-

Q9: Has your corporation been doing business in the State of Colorado, either directly or indirectly? If so, state:

(a) What is the nature of the business done in the State of Colorado?

(b) How long have you been doing business in the State of Colorado?

A9: See Introductory Notes 1, 2, and 3.

Q10: Did you have contracts with any persons or businesses in the State of Colorado that involve your products, directly or indirectly? If so, state:

(a) State the nature of those contracts or agreements.

(b) How long have you had such contracts or agreements with any person or business in the State of Colorado, and when was each such contract or agreement entered into?

A10: See Introductory Notes 1, 2, and 3.

Q11: Did you make long distance phone calls to any person or business in the State of Colorado that was related, directly or indirectly, to your products? If so, state:

(a) Approximately how many such phone calls were made

per year.

(b) What was the general nature of the business conducted by telephone?

(c) How long had you been conducting business by telephone to persons or corporations or businesses in the State of Colorado?

(d) Did any of the telephone calls made relate, directly or indirectly, to the sale of your products?

(e) Had your company been systematically and continuously doing business, directly or indirectly, within the State of Colorado? If so, for how long?

All: See Introductory Notes 1, 2, and 3.

Q12: Did you collect bills or debts due and owing or accounts receivable from any person or business in the State of Colorado arising out of the maintenance, repair, manufacture or sale of your products? If so, state:

(a) What person or businesses in the State of Colorado did you systematically collect accounts or handle credit matters for?

(b) How long had you been doing this?

(c) What percentage of your entire accounts receivable came from the State of Colorado on an annual basis?

(d) Were any of your employees or agents involved in the collection of accounts after delivery of your products in the State of Colorado?

A12: See Introductory Notes 1, 2, and 3.

Q13: Had you ever brought suit in the State of Colorado or been sued in the State of Colorado? If so, state:

(a) Please state the caption of each lawsuit and the Court in which it was filed together with the year it was filed.

(b) Had you ever retained attorneys in the State of Colorado to prosecute lawsuits or defend the same? If so, please state the name of any such attorney or law firm, the address and the caption of the lawsuit involved.

A13: See Introductory Notes 1, 2, and 3. The following information is available, however:

- (a) Herbert Edwin Gibson et ux v. Johns-Manville Products Corporation, et al. United States District Court, Civil Action No. 74-W-524, filed in 1974;

Alvin L. Morris et ux. v. Johns-Manville Products Corporation, et al., Colorado District Court for the County of Boulder, Civil Action No. 75-1504-1, filed in 1975;

Harold D. Tuttle v. Johns-Manville Products Corporation, et al., Colorado District Court for the County of Boulder, Civil Action No. 76-1503-1, filed in 1976;

Jack Tuttle v. Johns-Manville Products Corporation, et al., Colorado District Court for the County of Denver, Civil Action No. C-65700, filed in 1976.
- (b) William H. Hazlitt, Weller, Friedrich, Hickisch and Hazlitt, 900 Capitol Life Center, Denver, Colorado for all of those above listed actions.

Q14: Did you maintain any office in the State of Colorado?

If so, state:

- (a) State the address of each such office.
- (b) Were any such offices listed in the telephone directory?
- (c) The name of the agent or person responsible for each such office.
- (d) Was such agent, employee, or person a resident of the State of Colorado?

A14: No.

Q15: During the years in question, did any of your employees, agents or subcontractors travel to the State of Colorado on company business regarding your products? If so, state:

- (a) How many such trips were made in the years in question?
- (b) How many trips were made by air fare?
- (c) How many trips were made by other transportation means such as automobile or train?
- (d) What was the nature of the business conducted in the

State of Colorado by such person?

A15: See Introductory Notes 1, 2, and 3.

Q16: During the years in question, did your company systematically and continuously solicit sales of its products throughout Colorado by systematic distribution of sales literature and brochures to various persons and businesses within the State of Colorado? If not:

(a) Did you have a representative make such distribution? If so, please state the name of the representative.

(b) Did you use an independent contractor or third person to make such distribution? If so, please state the name of such independent contractor or third person.

A16: See Introductory Notes 1, 2, and 3.

Q17: During the years in question, did you accept purchase orders for your products from anyone or any business in the State of Colorado? If so, state:

(a) How many such purchase orders in each year in question?

(b) Which person or businesses did you receive purchase orders from?

(c) As a result of such purchase orders, were your products distributed in the State of Colorado?

A17: See Introductory Notes 1, 2, and 3.

Q18: Had your company performed services in the State of Colorado pursuant to any express or implied warranties on your products? Were you doing this in the years in question herein?

A18: See Introductory Notes 1, 2, and 3.

Q19: Had you carried on any business or transactions by mail with persons or businesses in the State of Colorado regarding your products? If so, state:

(a) Were you doing this in the years in question herein?

(b) Which persons or businesses were involved in the years in question herein?

A19: See Introductory Notes 1, 2, and 3.

Q20: Had any recall letters or recall literature been distributed in the State of Colorado by your company? If so, state:

(a) The date and nature of each such recall letter or information.

(b) Did any recall occur in the years in question herein? If so, please state the nature of that recall.

A20: See Introductory Notes 1, 2, and 3.

QC: For the period of time commencing in the year 1936 through the year 1942, inclusive, and again commencing in the year 1945 through the year 1955, inclusive, please answer the below-listed questions:

1. - 20. (All questions set forth in Section B, supra., are hereby incorporated herein by reference and wherever the word "Colorado" appears, please substitute therefor the word "ohio". In short, please apply questions B 1. - B. 20. to the State of Ohio for the time periods above set forth.

AC1: See Introductory Notes 1, 2, and 3.

AC2: See Introductory Notes 1, 2, and 3.

AC3: See Introductory Notes 1, 2, and 3.

AC4: See Introductory Notes 1, 2, and 3.

AC5: See Introductory Notes 1, 2, and 3.

AC6: See Introductory Notes 1, 2, and 3.

AC7: See Introductory Notes 1, 2, and 3.

AC8: Defendant is unable to fully and accurately respond to the interrogatory until plaintiffs specifically state the time, place, and specific acts of which complaint is made against this defendant. Until that time, defendant is unable to fully determine what law governs, what acts would or would not be covered, what policy periods are involved, and what other coverage may be available. However, defendant can state that it has had coverage supplied by the following insurers in the following amounts at certain periods of time:

Zurich America	100,000/300,000	6/58-1/61
Zurich America	500,000/500,000	1/61-11/64
Bituminous Casualty	500,000/500,000	11/64-1970
Continental Insurance	500,000/500,000	1970-1976
Continental Insurance	2,000,000/1,000,000	1977-

AC9: See Introductory Notes 1, 2, and 3.

AC10: See Introductory Notes 1, 2, and 3.

AC11: See Introductory Notes 1, 2, and 3.

AC12: See Introductory Notes 1, 2, and 3.

AC13: See Introductory Notes 1, 2, and 3. The following is a list of lawsuits filed against UNARCO in Ohio relating to UNARCO's asbestos operations:

- (a)
- Frank R. Allore, C-76-447, 5/5/76.
 - Wilfred R. Baumgartner, C-75-1057, 12/11/75.
 - Nellie V. Breedlove, C-74-1130, 12/9/74.
 - John F. Burke, C-73-239, 3/2/73.
 - Reba Chaddock, C-75-102, 2/5/75.
 - Harriet L. Drinkard, C-76-1318, 12/16/76.
 - Earl J. Grice, C-76-883, 8/20/76.
 - Robert J. Harter, C-75-452, 5/28/75.
 - Mary C. Kearns, C-73-70, 1/24/73.
 - James P. McGinnis, C-74-1077, 11/24/74.
 - John McKinnie, C-75-377, 4/29/75.
 - James E. McLaughlin, C-74-923, 10/11/75.
 - Mary R. McNeeley, C-75-74, 1/27/75.
 - Elmer J. Measor, C-73-238, 3/21/73.
 - Ray E. Mellott, C-75-1058, 12/4/75.
 - Mary Muntean, C-73-199, 2/23/73.
 - Kenneth J. Murphy, C-75-453, 5/28/75.
 - Rose A. Ricci, C-72-507, 5/18/72.
 - Evelyn Roderman, C-72-390, 4/24/72.
 - Betty Sedlock, C-72-395, 4/25/72.
 - Joseph E. Sedlock, C-76-1098, 10/12/76.
 - Jessie E. Starnes, C-76-46, 1/16/76.
 - Elbert H. Steele, C-75-359, 4/25/75.
 - Norma L. Swisher, C-77-162, 2/17/77.

All these suits were filed in the United States District Court for the Northern District of Ohio.

- (b)
- Robert Archibald, McNeal, Schick, Archibald & Carlson, 520 Williamson Building, Cleveland, Ohio 44114.

AC14: No.

AC15: See Introductory Notes 1, 2, and 3.

AC16: See Introductory Notes 1, 2, and 3.

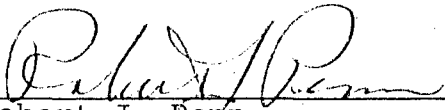
AC17: See Introductory Notes 1, 2, and 3.

AC18: See Introductory Notes 1, 2, and 3.

AC19: See Introductory Notes 1, 2, and 3.

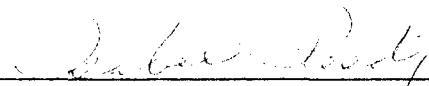
AC20: See Introductory Notes 1, 2, and 3.

UNARCO INDUSTRIES, INC.

By 
Robert J. Penn
Financial Vice President
Unarco Industries, Inc.
332 South Michigan Avenue
Chicago, IL

COUNTY OF COOK)
) ss.
STATE OF ILLINOIS)

Subscribed and sworn to before me this 20th day of April,
1977.


Notary Public

My Commission Expires June 16th, 1979

I hereby certify that I have this 27th day of April, 1977, served true copies of the foregoing Unarco's Answers to First Set of Interrogatories upon all counsel of record by placing true copies of same in the United States Mail, postage prepaid, addressed as follows:

William A. Trine, Esq.
WILLIAMS, TRINE & GREENSTEIN, P.C.
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Denver, CO 80222

Carole Niemi

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF BOULDER

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KATE SCHNEIDER,

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CORPORATION, a Pennsylvania corporation,
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CORPORATION, a Maryland corporation,
NICOLET INDUSTRIES, a Pennsylvania
corporation, and 48 INSULATION, INC.,
an Illinois corporation, FIBREBOARD
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and EAGLE-PICHER INDUSTRIES, an Ohio
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ANSWERS TO
SECOND SET OF
INTERROGATORIES

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Q1: Please state the official title or position in defendant corporation of the person or persons answering these Interrogatories and signing the same.

A1: Robert J. Penn, Vice President - Finance.

Q2: Do you manufacture insulation? If so, state:

(a) The location of each manufacturing plant which you operate, own or control, which has manufactured insulation or presently does manufacture insulation and the dates or time period that each such plant manufactured insulation.

(b) With regard to each such manufacturing plant or facility, please describe what geographic areas such plant distributed or sold insulation in, to wit, the precise geographic area of distribution and if this changed from time to time, describe what time periods distribution was made and in what geographic areas.

(c) Does your insulation contain amosite or has your manufactured insulation at any time contained amosite? If so, please state which manufacturing facilities or plants manufacture insulation containing amosite or which such facilities or plants have ever manufactured insulation containing amosite and over what time periods.

(d) Does your insulation contain chrysotile or has your manufactured insulation at any time contained chrysotile? If so, please state which manufacturing facilities or plants manufacture insulation contain chrysotile or which such facilities or plans have ever manufactured insulation containing

chrysotile and over what time periods.

(e) If your insulation at one time contained amosite, but no longer does, please state the date that amosite was no longer used in each manufacturing plant or facility, and please state why you ceased using amosite.

(f) If your insulation at one time contained chrysotile, but no longer does, please state the date that chrysotile was no longer used in each manufacturing plant or facility, and please state why you ceased using chrysotile.

(g) Are you presently in possession of any insulation manufactured for sale or distribution which contains amosite, i.e., in storage or stock-piled, etc.? If so, please state the location or locations of such insulation and the approximate amount of such insulation in storage or stock-piled.

(h) Are you presently in possession of any insulation manufactured for sale or distribution which contains chrysotile, i.e., in storage or stock-piled, etc.? If so, please state the location or locations of such insulation and the approximate amount of such insulation in storage or stock-piled.

(i) If you are no longer selling and distributing insulation containing amosite, please state when the last sale or distribution of insulation containing amosite occurred and at what factory or location.

(j) If you are no longer selling and distributing insulation containing chrysotile, please state when the last sale or distribution of insulation containing chrysotile occurred and at what factory or location.

(k) Please state each and every brand name under which any and all of your asbestos containing products were at any time since 1937 marketed, including for each such brand name listed the following information:

(1) The type of material bearing a particular brand name, for example, but not by way of limitation, "mud", "cement", or "powder", "blankets", "blocks", or the like;

(2) The date when each such brand name product was first placed on the market for sale;

(3) The date when each such brand name product ceased to be marketed;

(4) The specific function or purpose of each brand name product;

(5) The chemical composition of each brand name product;

(6) The geographical area of distribution for each such brand name product.

A2: No, but see Introductory Notes 1, 2, and 3.

Q3: Do you manufacture any products other than insulation which contain asbestos fibers? If so, state:

(a) Please describe in detail the type product so manufactured, where the same is manufactured, and how long you have manufactured such products.

(b) The location of each manufacturing plant which you operate, own or control, which has manufactured any other such products or presently does manufacture such products and the dates or time period that each such plant manufactured such products.

(c) With regard to each such manufacturing plant or facility, please describe what geographic areas such plant distributed or sold such products in, to wit, the precise geographic areas of distribution and if this changed from time to time, describe what time periods distribution was made and in what geographic areas.

(d) Do such products contain amosite or have your manufactured products at any time contained amosite? If so, please state which manufacturing facilities or plants manufacture such products containing chrysotile or which such facilities or plants have ever manufactured products containing chrysotile and over what time periods.

(e) Do such products contain chrysotile or have your

manufactured products at any time contained chrysotile? If so, please state which manufacturing facilities or plants manufacture such products containing chrysotile or which such facilities or plants have ever manufactured products containing chrysotile and over what time periods.

(f) If your products at one time contained amosite, but no longer do, please state the date that amosite was no longer used in each manufacturing plant or facility, and please state why you ceased using amosite.

(g) If your products at one time contained chrysotile, but no longer do, please state the date that chrysotile was no longer used in each manufacturing plant or facility, and please state why you ceased using chrysotile.

(h) Are you presently in possession of any products manufactured for sale or distribution which contain amosite, i.e., in storage or stock-piled, etc.? If so, please state the location or locations of such products and the approximate amount of such products in storage or stock-piled.

(i) Are you presently in possession of any products manufactured for sale or distribution which contain chrysotile, i.e., in storage or stock-piled, etc.? If so, please state the location or locations of such products and the approximate amount of such products in storage or stock-piled?

(j) If you are no longer selling and distributing products containing amosite, please state when the last sale or distribution of such products containing amosite occurred and at what factory or location.

(k) If you are no longer selling and distributing products containing chrysotile, please state when the last sale or distribution of such products containing chrysotile occurred and at what factory or location.

A3: No.

Q4: Please state what records, if any, are kept under your supervision, direction or control with reference to the names of

employees or former employees or agents of your company who have become diseased, ill, disabled, or deceased as a result of: (1) cancer of the lung; (2) cancer of the stomach; (3) asbestosis; (4) mesothelioma; or (5) any illness or condition which may have been related to exposure to asbestos; i.e., heart disease, cancer of the throat or anus, etc. If so, state:

(a) Please characterize or describe in general terms the nature of the statistics or information which you have accumulated and over what time periods.

(b) Does such information include the names of employees, addresses, names of doctors, treating such employees, or their present location or address?

(c) Are such records kept for each manufacturing plant or facility which you own, operate or control? If not, please describe for each such plant or facility, what such records, if any, are kept or maintained and for what periods of time.

A4: See Introductory Notes 1, 2, and 3.

Q5: Has your company had internal rules or regulations at any time pertaining to the threshold limit of numbers of asbestos particles contained in a cubic foot of air, or some other formula or standard? If so, state:

(a) Please state the precise rule or regulation in effect at various times, and if the rule or regulation varied from time to time, please state the date or dates that such rule was changed and describe the precise threshold limit value of asbestos particles per cubic foot of air in effect at various times.

(b) If the threshold limit varied from manufacturing plant to manufacturing plant within your corporation or organization, please describe the variance in detail and the threshold limit placed on each plant, by name and description.

(c) Did the threshold limit rule or policy in effect at any given time pertain to dust particles per cubic foot or asbestos fibers per cubic foot?

(d) If the threshold limit pertained to asbestos fibers, please state and describe in detail the monitoring equipment in use to monitor or determine the number of asbestos fibers per cubic foot of air. In doing so, please state brand name, date of monitoring equipment and otherwise describe the monitoring equipment in sufficient terms so that the same can be identified.

(e) If the monitoring equipment to determine threshold limits varied from time to time, please state which monitoring equipment was used for various time periods and when that monitoring equipment was exchanged for new or different equipment.

A5: No.

Q6: Is your corporation a member of the Industrial Hygiene Foundation of America? If so:

(a) How long has your corporation been a member of said foundation?

(b) Please state the name or names of persons within your corporation who have attended meetings of said foundation.

(c) Has your corporation rendered financial assistance to said foundation? If so, over what period of time?

(d) To your knowledge, when was that foundation organized and how long has it been in existence?

(e) To your knowledge, what is the purpose or function of that foundation?

A6: No.

Q7: Is your corporation a member of the American Conference of Governmental Industrial Hygienists? If so:

(a) How long has your corporation been a member of said conference?

(b) Please state the name or names of persons within your corporation who have attended meetings of said conference.

(c) Has your corporation rendered financial assistance to said conference? If so, over what period of time?

(d) To your knowledge, when was that conference organized and how long has it been in existence?

(e) To your knowledge, what is the purpose or function

of that conference?

A7: No.

Q8: Is your corporation a member of the Asbestos Textile Institute? If so:

(a) How long has your corporation been a member of said institute?

(b) Please state the name or names of persons within your corporation who have attended meetings of said institute.

(c) Has your corporation rendered financial assistance to said institute? If so, over what time period?

(d) To your knowledge, when was that institute organized and how long has it been in existence?

(e) To your knowledge, what is the purpose or function of that institute?

A8: No.

Q9: Is your corporation a member of the Asbestos Information Association of North America? If so:

(a) How long has your corporation been a member of said association?

(b) Please state the name or names of persons within your corporation who have attended meetings of said association.

(c) Has your corporation rendered financial assistance to said association? If so, over what period of time?

(d) To your knowledge, when was that institute organized and how long has it been in existence?

(e) To your knowledge, when was that association organized and how long has it been in existence?

A9: No.

Q10: Is your corporation a member of the Institute of Occupational and Environmental Health of the Quebec Asbestos Mining Association? If so:

(a) How long has your corporation been a member of said institute?

(b) Please state the name or names of persons within your corporation who have attended meetings of said institute.

(c) Has your corporation rendered financial assistance to said institute? If so, over what period of time?

(d) To your knowledge, when was that institute organized and how long has it been in existence?

(e) To your knowledge, what is the purpose or function of said institute?

A10: No.

Q11: Is your corporation a member of the Institute of Occupational and Environmental Health? If so:

(a) How long has your corporation been a member of said institute?

(b) Please state the name or names of person within your corporation who have attended meetings of said institute.

(c) Has your corporation rendered financial assistance to said institute? If so, over what period of time?

(d) To your knowledge, when was that institute organized and how long has it been in existence?

(e) To your knowledge, what is the purpose or function of said institute?

A11: No.

Q12: Is your corporation a member of the Quebec Asbestos Mining Association? If so:

(a) How long has your corporation been a member of said association?

(b) Please state the name or names of persons within your corporation who have attended meetings of said association.

(c) Has your corporation rendered financial assistance to said association? If so, over what period of time?

(d) To your knowledge, when was that association organized and how long has it been in existence?

(e) To your knowledge, what is the purpose or function of that association?

A12: No.

Q13: Have you at any time contributed to or financially supported the Department of Epidemiology and Health of McGill University?

If so:

(a) Please state what contributions or financial support you have rendered and over what period of time.

A13: No.

Q14: Please state the name or names of all medical physicians that you have paid or retained on a consulting basis with reference to possible asbestos fiber-related diseases or illnesses and the last known address of each such physician. With reference thereto, please state:

(a) For each such physician, please state the project that such physician worked on and the time period involved.

(b) For each such physician, please state the nature of his responsibilities or duties.

(c) For each such physician, please state which manufacturing plant or facility that said physician worked in, had contact with, or studied.

(d) With reference to each such physician, please state whether written reports were submitted containing findings, statistical information, or the results of any studies performed or conducted by such physicians on your behalf.

A14: To the best of our knowledge we have never retained physicians for such services, but see Introductory Notes 1, 2, and 3.

Q15: Please state the name or names of all industrial engineers, chemists or other independent professional persons other than physicians that you have paid or retained on a consulting basis with reference to what work or studies they did with regard to asbestos threshold counts, monitoring asbestos fibers in the atmosphere, ventilation systems, respirators, etc. With reference thereto, please state:

(a) For each such person, please state the nature of his responsibilities or duties.

(b) For each such person, please state the project that such person worked on and the time period involved.

(c) For each such person, please state which manufacturing plant or facility that said person worked in, had contact with, or studied.

(d) With reference to each such person, please state whether written reports were submitted containing findings, statistical information, or the results of any studies performed or conducted by such persons on your behalf.

A15: To the best of our knowledge no such persons were employed in the capacities stated.

Q16: With regard to the manufacture of insulation containing asbestos particles, please answer the following questions:

(a) Have you ever placed cautionary or warning signs or instructions on the packaging or crates containing asbestos insulation and, if so, please state verbatim the language contained on such warning or cautionary instruction.

(b) Please state the date or dates that each such warning or cautionary instruction was first used and in what manner the same was used.

(c) For each such warning or cautionary instruction, please state the manner in which the same was affixed or attached to any packaging or crating above-described.

(d) If convenient to do so, please attach a copy of such warning or cautionary instruction.

(e) Did such warning or cautionary instruction relate to or pertain in any way to any health hazard created by exposure to asbestos dust?

A16: (a) "CAUTION - This product contains asbestos fiber. Inhalation of asbestos in excessive quantities over long periods of time may be harmful. If dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirators approved by the U. S. Bureau of

Mines for pneumoconiosis producing dusts.

(b) Beginning in the late 1960's.

(c) The labels were gummed and affixed to the packaging of the products.

(d) Attached please find a photocopy of defendant's said warning label.

(e) Yes.

Q17: Have you ever advised those using your products of your so-called threshold limits? If you did, describe exactly how you advised those using your products of such threshold limits, the precise language used in the warning or advice given, and the date or dates that you instituted such procedures.

A17: The limited information available to us at the present time is not sufficient to permit us to fully answer. To the best of our present knowledge, however, the answer is in the negative. But see Introductory Notes 1, 2, and 3.

Q18: If you did not advise those using your products of such threshold limits, explain why you did not.

A18: Due to the fact that we have but limited information presently available to us, as stated in interrogatory 17, and therefore are unable to definitely state whether we have ever advised those using our products of our so-called threshold limits, we are unable to state with any certainty why we did or did not so advise.

Q19: Has your corporation, or anyone acting on its behalf or pursuant to its directions or instructions, ever gone into the field and seen, observed, or counted, or in any way ascertained how much dust is created by the workers applying your products when such workers are in an enclosed area such as a building, factory, room, or confined space? If so:

(a) Please state the date or dates of such observation or investigation and the place that such observation or investigation occurred.

(b) Please state whether monitoring equipment was used.

this defendant to fully answer.

Q21: Do you have in your possession any scientific studies, medical literature, or other documents or information not heretofore described, related to any health hazards, illnesses or disease that could possibly be related to asbestos industry? If so:

(a) Please describe by title, author and date, each such study, article, document, book or literature.

(b) For each such material, please state when you came into possession of same and what use has been made of same.

(c) For each such material, please state whether the same has been made available to or disclosed to the board of directors of your company and/or the officers of your company. If so, please state when each such study, document or material was supplied or submitted to your board of directors or to any officer.

A21: No.

A22: In October, 1964, the New York Academy of Sciences sponsored an international conference on the biological effects of asbestos, which conference was held at the Waldorf-Astoria. Was this conference attended by any representative or representatives of your corporation? If so:

(a) Please state the full name and present address, if known, of the person or persons who attended this conference.

(b) Please state the job title or position held in your corporation by each such person who attended said conference.

(c) If you directed or instructed or paid some person not employed by your corporation to attend such conference, please state the name, address and title of such person or persons.

(d) Did any person attending this conference at your request or on your behalf, submit a written report or written document of any kind to your corporation as a result of such conference? If so, please state the title of the document, the author of same, the date of same, and where a copy of same is

presently located.

(e) Did any such person representing your corporation or attending said conference on your behalf, give a prepared talk or speech at said conference or make a statement to those present and, if so, please state the name and address of such person and whether such statement, talk or speech was reduced to writing. If so, please state where a copy of such speech or writing is located.

A22: No.

Q23: For each year subsequent to 1933, please state the name of your industrial health officer at each manufacturing plant or facility engaged in the manufacture of products containing asbestos. Please state the present address of each such person, if known.

A23: To our knowledge no such industrial health officers were retained by this Company.

Q24: Please state the number of workmen's compensation claims which have been filed by your employees claiming asbestos-related illnesses or diseases in the following categories:

- (a) asbestosis
- (b) mesothelioma
- (c) cancer of the lungs
- (d) miscellaneous, including heart disease

A24: With respect to subpart (a), see Introductory Notes 1, 2, and 3. Defendant objects to subparts (b) and (c) as irrelevant. Defendant objects to subpart (d) as irrelevant and overly broad, vague, ambiguous, and ill-defined.

Q25: Please state the total amount of workmen's compensation benefits awarded to employees of your corporation for asbestos-related diseases or injury. In addition:

(a) If possible, please categorize the total amount of workmen's compensation benefits paid geographically by state, and the amount for each category of illness or disease.

A25: Defendant objects to this interrogatory on the grounds that

it is irrelevant, overly broad, vague, ambiguous, and ill-defined. See also Introductory Notes 1, 2, and 3.

Q26: Have you at any time shut down an asbestos product manufacturing plant because of the high incidence of asbestos-related illnesses and diseases? If so:

(a) Please state which plant was shut down and the date that dismantling of the plant began or the date that the same was sold to some other entity or industry.

A26: No.

Q27: Has your corporation at any time followed a policy, or procedure of terminating or discharging employees showing evidence of asbestos-induced illness or disease, at any plant or facility which you operate, maintain or control? If so:

(a) Please state which plants or facilities have followed such a policy or procedure.

(b) Please state when such policy or procedure was commenced or enacted.

(c) Please state whether, for each such plant or facility, periodic medical examinations were required of all employees to determine whether evidence of asbestos-induced illness or disease was evidenced.

A27: No.

Q28: In February, 1972, the Advisory Committee on the Asbestos Standard, held hearings under the Occupational Safety and Health Act of 1970, to determine what threshold asbestos dust particle standards should be enacted under that federal legislation. Did any representative of your company, or anyone acting on your behalf, attend said hearing? If so:

(a) Please state the name and address of each such person who did attend such hearing.

(b) Please state whether any such person gave testimony at said hearing and, if so, which person or persons.

(c) Please state whether such testimony was given with

your consent and pursuant to your authority, direction and control.

(d) Please state whether a report was made to you with reference to the hearing so conducted and whether that report was in writing. If so, please state the author of the report, the date of same and where a copy of same is presently located.

(e) Did you receive a transcript of the testimony given at that hearing?

(f) What position, if any, did your company take with reference to the threshold standards that should be recommended by the Advisory Committee of the Asbestos Standard? Was that position made known at the hearing held in February, 1972?

A28: No.

Q29: Two lawsuits were commenced against the Reserve Mining Company in the United States District Court in Minnesota and consolidated for trial before Judge Miles W. Lord, concerning the contamination of Lake Superior with asbestos, and trial commenced on the consolidated cases on August 1, 1973. Did any representative or anyone acting on your behalf, attend that trial or testify at that trial? If so:

(a) Please state the name and address of each such person who attended the trial.

(b) Please state the name and address of each such person who testified at that trial.

(c) Did you receive a transcript of the testimony or a portion of same given at that trial and, if so, where is your copy of same located?

A29: No, not to our knowledge.

Q30: Did Dr. Selikoff at any time request your corporation to make employment records available to him, so that he could undertake a survey of some or all of the persons who have worked in one or more of your construction plants or facilities, or otherwise request that you furnish him with materials? If so:

(a) Please state when the request was made and whether the same was oral or in writing.

(b) If in writing, please state the date of the document and, if you are willing to do so without a Motion to Produce, please attach a copy of same.

(c) Please state what information or records Dr. Selikoff sought.

(d) Please state what your response was to Dr. Selikoff.

(e) If that response was in writing, please set forth the response verbatim, or, if convenient, please attach a copy hereto.

(f) If you were willing to cooperate with Dr. Selikoff, please state why?

A30: No, not to our knowledge.

Q31: Is your corporation in possession of the study done by Dr. Muriel L. Newhouse of the Department of Occupational Health at the London School of Hygiene and Tropical Medicine, which study sets forth the results of her investigation of 76 cases of mesothelioma? If so:

(a) Please state when you received a copy of such study and where your copy is located.

(b) What use, if any, was made of that study.

A31: No.

Q32: Are you in possession of the study done by Dr. G. J. Thompson, of South Africa, relating to the incidence of lung disease to asbestos dust exposure in the industrial areas of South Africa? If so:

(a) Please state when you received a copy of such study and where your copy is located.

(b) What use, if any, was made of that study.

A32: No.

Q33: Have you at any time since 1937 supplied raw or unfinished asbestos or asbestos containing material to any other entity or person to be used by that entity or person in the manufacture or fabrication of other products?

A33: Not to our knowledge. Our products were principally used in their final form as manufactured by the Company.

Q34: If the answer to 33 above is affirmative, please state the name or names and locations of each and every person to whom you supplied raw or unfinished asbestos and the date or dates when such entity or person was so supplied.

A34: Not applicable.

Q35: Did you distribute finished asbestos containing products to wholesalers or jobbers at any time between 1937 and 1974?

A35: Yes.

Q36: If the answer to 35 above is affirmative, please state the name, location and date or dates such wholesaler or jobber was supplied with finished asbestos products.

A36: Our principal customers were railroad contractors and distributors for ultimate use in oil, chemical, steel and mill supply industries. Since we have not been in the business for approximately seven years and records are no longer available it is impossible to answer this interrogatory as to specific dates, locations, and names of all wholesalers and jobbers who handled our products between 1937 and 1974. However, it is known that key distributors of our products were the Aber Co. in Houston, Texas; Gabler Insulations in New Orleans, La.; W. F. Lane Co. in San Francisco, California; Philadelphia Asbestos in Philadelphia, Pennsylvania; Eastern Refractories in Boston, Massachusetts; C. E. Thruston & Sons in Norfolk, Virginia; Insulation Services in Tulsa, Oklahoma; Badham Insulations in Birmingham, Alabama.

UNARCO INDUSTRIES, INC.

By Robert J. Penn
Robert J. Penn
Financial Vice President
Unarco Industries, Inc.
332 South Michigan Avenue
Chicago, IL

COUNTY OF COOK)
) ss.
STATE OF ILLINOIS)

Subscribed and sworn to before me this 20th day of April, 1977.

Robert J. Penn
- 19 - Notary Public My Commission Expires June 16th, 1979

CAUTION

THIS PRODUCT CONTAINS ASBESTOS FIBER. INHALATION OF ASBESTOS IN EXCESSIVE QUANTITIES OVER LONG PERIODS OF TIME MAY BE HARMFUL.

IF DUST IS CREATED WHEN THIS PRODUCT IS HANDLED, AVOID BREATHING THE DUST. IF ADEQUATE VENTILATION CONTROL IS NOT POSSIBLE, WEAR RESPIRATORS APPROVED BY THE U.S. BUREAU OF MINES FOR PNEUMOCONIOSIS PRODUCING DUSTS.

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF BOULDER
STATE OF COLORADO
Civil Action No. 77-0609-1

GEORGE L. SCHNEIDER, and his wife,
KATE SCHNEIDER,

Plaintiffs,

vs.

JOHNS-MANVILLE PRODUCTS CORPORATION,
a Delaware corporation, UNARCO INDUSTRIES,
INC., an Illinois corporation, G.A.F. CORPOR-
ATION, a Delaware corporation, STANDARD
ASBESTOS MANUFACTURING AND INSULATING
COMPANY, a Missouri corporation, OWENS-
CORNING FIBERGLAS CORPORATION, a Dela-
ware corporation, PITTSBURGH CORNING
CORPORATION, a Pennsylvania corporation,
THE CELOTEX CORPORATION, a Delaware
corporation, CERTAIN-TEED PRODUCTS
CORPORATION, a Maryland corporation,
NICOLET INDUSTRIES, a Pennsylvania corpora-
tion, and 48 INSULATION, INC., an Illinois
corporation, FIBREBOARD CORPORATION, a
Delaware corporation, and EAGLE-PICHER
INDUSTRIES, an Ohio corporation, RILEY STOKER
CORPORATION, a Massachusetts corporation,

Defendants.

UNARCO'S
ANSWERS TO THIRD SET
OF INTERROGATORIES

COMES NOW defendant UNARCO INDUSTRIES, INC., by and through its
attorneys, Weller, Friedrich, Hickisch and Hazlitt, and answers plaintiffs' interroga-
tories as follows:

Q1: If you are willing to do so, without notice to produce, please attach a copy
of the last annual financial statement prepared for your corporation for the last
fiscal or calendar year, to reflect assets, liabilities, net profit or earnings.

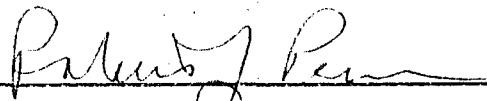
A1: We are willing to produce a copy of our latest financial statement. Attached
please find our annual report for the year 1976.

Q2: If you are unwilling to attach a copy of such statement, please set forth,
verbatim, the content of such financial statement.

A2: See answer to Interrogatory No. 1.

Q3 : Was such statement prepared on an accrual basis of accounting, or cash basis?

A3 : This statement was prepared on an accrual basis of accounting.



Robert J. Penn - Financial Vice President
Unarco Industries, Inc.
332 South Michigan Avenue
Chicago, Illinois

COUNTY OF COOK)
) ss:
STATE OF ILLINOIS)

SUBSCRIBED AND SWORN to before me this 20th day of April,
1977.



Notary Public

My Commission Expires June 16th, 1979

My commission expires:

I hereby certify that I have this 27th day of April, 1977, served true copies of the foregoing Unarco's Answers to Third Set of Interrogatories upon all counsel of record by placing true copies of same in the United States Mail, postage prepaid, addressed as follows:

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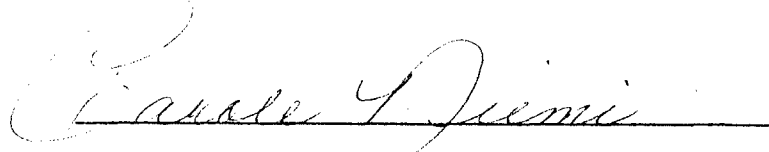
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Counsel

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF BOULDER
STATE OF COLORADO

Civil Action No. 77-0609-1

GEORGE L. SCHNEIDER, and his wife,)
KATE SCHNEIDER,)
)
Plaintiffs,)

vs.)

JOHNS-MANVILLE PRODUCTS CORPORATION,)
a Delaware corporation, UNARCO)
INDUSTRIES, INC., an Illinois corp-)
oration, G.A.F. CORPORATION, a Delaware)
corporation, STANDARD ASBESTOS MANU-)
FACTURING AND INSULATING COMPANY, a)
Missouri corporation, OWENS-CORNING)
FIBERGLAS CORPORATION, a Delaware)
corporation, PITTSBURGH CORNING)
CORPORATION, a Pennsylvania corporation,)
THE CELOTEX CORPORATION, a Delaware)
corporation, CERTAIN--TEED PRODUCTS)
CORPORATION, a Maryland corporation,)
NICOLET INDUSTRIES, a Pennsylvania)
corporation, and 48 INSULATION, INC.,)
an Illinois corporation, FIBREBOARD)
CORPORATION, a Delaware corporation,)
and EAGLE-PICHER INDUSTRIES, an Ohio)
corporation, RILEY STOKER CORPORATION,)
a Massachusetts corporation,)
)
Defendants.)

UNARCO INDUSTRIES
INC.'S RESPONSES TO
PLAINTIFFS' REQUEST
FOR ADMISSIONS

COMES NOW defendant UNARCO by and through its attorneys,
Weller, Friedrich, Hickisch, and Hazlitt, and responds to plaintiffs'
request for admissions as follows:

NOTE: The answers given by this defendant are subject to the
following:

1. Unarco has not been involved in the asbestos business for several years. Its files have been disposed of by either giving them to the purchasers of the various segments of its former asbestos business or they were destroyed after the sale of the last asbestos plant in 1970.
2. Unarco has been involved in litigation wherein the issues have been somewhat similar to those involved here. Counsel is attempting to determine whether discovery of matters similar to those now inquired into was conducted and, if so, what was learned by counsel in that case or cases. If the discovery filed therein was similar and if enough information was developed in such case to respond to the discovery and if present counsel is able to obtain such information, it may be possible to provide further response to plaintiffs' requests

3. Objection is made to all requests which refer to diseases, ailments, or illnesses other than asbestosis on the ground that the complaint alleges that Plaintiff George L. Schneider has contracted only asbestosis and references to any other diseases, ailments or illnesses are irrelevant and not intended to lead to the discovery of relevant information.

ANSWERS:

1. This defendant admits request 1, 8, 9, 10, 11, 16, 20g, 21, 22, and 135.

2. Requests 3 and 4 are not requests for admissions. If they are deemed to be requests, they are hereby denied.

3. Requests 81, 83, 96, and 153 are not applicable in light of this defendant's answers to other requests to which these requests make reference.

4. Requests 87, 117, 118, and 119 do not request admissions from this defendant and, if they do, they are hereby denied.

5. No request 36 is made and thus no answer is required.

6. Objection is made to number 17 on the ground that it is vague and ambiguous, that it fails to state by whom such classification is made, and that it is irrelevant as noted in Introductory Note 3 above.

7. Requests 26, 27, 28, 29, and 30 are denied on the ground, inter alia, that the Exhibits speak for themselves; there is no Exhibit 2 attached to the Requests served upon this defendant; and, Exhibit A is, in part, illegible.

8. Request number 88 is denied. Each person's lungs are different.

9. Objections are made to requests 19, 37, 38, 46, 47, 48, 49, 50, 85, 86, 97, 99, 100, 104, 105, 106, 125, and 126 on the grounds that these requests are neither relevant nor designed to lead to the discovery of relevant information.

10. Objection is made to request 66 on the ground that as phrased, it is impossible to answer.

11. Objection is made to request 120 on the grounds that the request is neither relevant nor designed to lead to the discovery of relevant information; that it is unclear as to what report

reference is made; that the request is vague and ambiguous; and that it calls for an opinion and not an admission of a fact.

12. Objection is made to request 101 on the grounds that the language of the request is ill-defined, ambiguous, and vague, and that it requires an opinion statement rather than an admission or denial of a fact in issue.

13. Requests 39, 43, 69, 102, 107, 112, 114, 115, 122, 123, 127, 128, 129, 130, 131, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, and 150 are denied for the following reasons: these requests ask this defendant to admit that a specific statement was made or printed and that certain reports or hearings were reduced to print or otherwise published. Apparently, plaintiff possesses copies of these writings or documents or has access to them, while defendant does not. See Introductory Note 1. If plaintiff will provide copies of such writings to defendant, defendant will consider admitting that such are genuine and authentic copies. But based solely upon the information given in the requests, this defendant is unable to admit or deny at this point, and thus denies the same.

14. Requests 70, 103, 108, and 116 are dependent upon requests which have been denied in paragraph 13 above. Should plaintiff furnish such writings and documents in the predicate requests, this defendant will consider whether it can admit or deny these requests, and until such time denies these requests.

15. Request 5 is denied. Defendant states that under some circumstances - not defined in the request - dust containing asbestos particles could be emitted.

16. Request 12 is denied. Defendant states that under some circumstances, not defined in this broad, vague and general request - dust containing asbestos particles could be emitted.

17. Defendant objects to requests 56, 57, 61, 63, 65, 68, 71, 72, 76, 78, 90, and 92 on the grounds that these requests are unanswerable as drafted for they call for speculation, are compound,

and assume the truth of other matters to which no response has been requested. Defendant can not state "when it stopped beating its wife" if it is not established that such a battery was ever committed.

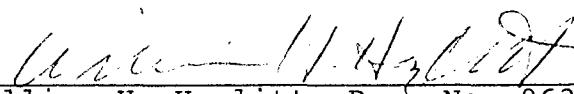
18. Defendant objects to request 73 on the following grounds: it is compound, vague, and incoherent; it can not be answered for the same reasons stated in paragraph 13 above, and no indication sufficient to respond is given as to what conference the request refers to.

19. Defendant objects to request 74 on the grounds that no letter is referred to in the predicate request, 69, and that therefore the request is incoherent, vague, and ambiguous. It is also objectionable for the same reasons as are stated in paragraph 15 above.

20. All other requests not specifically admitted are hereby denied. See also Introductory Notes 1, 2, and 3 above.

WELLER, FRIEDRICH, HICKISCH, & HAZLITT

By


William H. Hazlitt, Reg. No. 963
Attorneys for Unarco Industries
900 Capitol Life Center
Denver, Colorado 80203 861-8000

Address of Defendant:
Unarco Industries, Inc.

332 South Michigan Avenue
Chicago, IL 60604

CERTIFICATE OF MAILING

I hereby certify that I have this 1st day of April, 1977, served true copies of the foregoing Unarco Industries Inc.'s Responses to Plaintiffs' Request for Admissions upon all counsel of record by placing true copies of same in the United States Mail, postage prepaid, addressed as follows:

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Denver, Colorado 80202

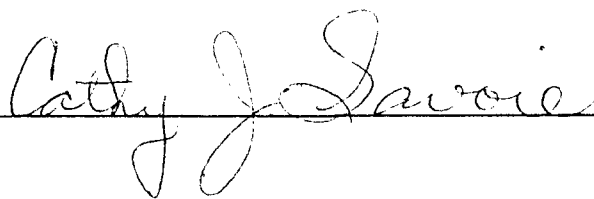
David B. Higgins, Esq.
LONG & JAUDON, P.C.
310 Denver Club Building
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John Clough, Esq.
WHITE AND STEELE
1660 Lincoln Tower Building
Denver, Colorado 80203

WYATT AND SOMMERMEYER
870 Savings Building
Fort Collins, Colorado 80521

Kenneth C. Groves, Esq.
1000 Capitol Life Center
Denver, Colorado 80203

Jack Kent Anderson, Esq.
DeMOULIN, ANDERSON, CAMPBELL
AND LAUGENSEN
6780 East Hampden Avenue
Denver, Colorado 80222



SEP 29 1977 REC'D

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF BOULDER
STATE OF COLORADO
Civil Action No. 74-1206-2 D

In re:) UNARCO INDUSTRIES, INC.'S
ASBESTOS CASES,) RESPONSE TO PLAINTIFFS'
) REQUEST FOR ADMISSIONS
)

COMES NOW the Defendant Unarco Industries, Inc.,
by and through its attorneys, Weller, Friedrich, Hickisch and
Hazlitt, in accordance with the new procedures pertaining to
discovery as per the Order of Judge Dana dated August 30, 1977,
to incorporate in its entirety the objections to and responses
to Request for Admissions previously filed in Schneider v.
Johns-Manville Products, et al., Civil Action No. 77-0609-1,
as its complete Response to the Request for Admissions submitted
in John Mathis vs. Johns-Manville, et al., 77-2014-2; in Patton
B. Gilmore vs. Johns-Manville, et al., 77-2012-1; and in Willard
Alvin Mark vs. Johns-Manville, et al., 77-2013-1.

WELLER, FRIEDRICH, HICKISCH AND HAZLITT

By William H. Hazlitt
William H. Hazlitt, Reg. No. 963
900 Capitol Life Center
Denver, CO 80203
861-8000
Attorneys for Defendant
Unarco Industries, Inc.

Address of Defendant
Unarco Industries, Inc.:
332 South Michigan Avenue
Chicago, IL 60604

I hereby certify that I have this 28th day of September, 1977, served true copies of the foregoing Unarco Industries, Inc.'s Response to Plaintiffs' Request for Admissions upon all counsel of record by placing said true copies in the United States Mail, postage prepaid, addressed as follows:

Mr. William K. Ris
Attorney at Law
Wood, Ris & Hames
900 Denver Club Building
Denver, CO 80202

Mr. Jack Kent Anderson
Attorney at Law
DeMoulin, Anderson, Campbell & Laugesen
6780 East Hampden Avenue
Denver, CO 80224

Mr. William J. Madden
Attorney at Law
Madden and Strate
2201 Kipling Street
Denver, CO 80215

Mr. James E. Elliott, Jr.
Attorney at Law
Elliott & Greengard
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Denver, CO 80209

Mr. David B. Higgins
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Denver, CO 80202

Mr. Richard P. Holme
Attorney at Law
Davis, Graham & Stubbs
950 - 175h Street
Denver, CO 80202

Mr. Albert E. Zarlengo, Jr.
Attorney at Law
Zarlengo, Mott & Zarlengo
1020 American National Bank Building
Denver, CO 80202

Mr. Donald E. LaMora
Attorney at Law
430 North Tejon
Suite 303
Colorado Springs, CO 80903

Mr. James F. Pamp
Attorney at Law
101 University Boulevard
Suite 420
Denver, CO 80206

Mr. Charles Q. Socha
Attorney at Law
Tilly & Graves
800 Steele Park
50 South Steele Street
Denver, CO 80209

Mr. J. Conard Metcalf ✓
Williams, Trine & Greenstein
1405 Arapahoe Avenue
Boulder, CO 80302

Mr. Edward H. Widmann
Yegge, Hall & Evans
1340 Denver Club Building
Denver, CO 80202

Mr. Kenneth Groves
Attorney at Law
1000 Capitol Life Center
Denver, CO 80203

Mr. John Walberg
Attorney at Law
Walberg & Pryor
801 East 17th Avenue
Denver, CO 80218

Mr. Michael Hilgers
Attorney at Law
Suite 712
Title Building
909 - 17th Street
Denver, CO 80202

Dipie Harris

IN THE DISTRICT COURT IN AND FOR THE
COUNTY OF BOULDER
STATE OF COLORADO
Civil Action No. 79-CV-0559-1

MALCOLM J. PANTHER,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	PLAINTIFF'S INTERROGATORIES AND
	)	REQUESTS FOR ADMISSIONS TO THE
JOHNS-MANVILLE PRODUCTS	)	DEFENDANT, UNARCO INDUSTRIES, INC.
CORPORATION, et al.	)	(September 12, 1979)

TO: DEFENDANT, UNARCO INDUSTRIES, INC., AND ITS ATTORNEYS
OF RECORD:

Plaintiff, by his undersigned counsel, propounds the within Interrogatories and Requests for Admissions to the Defendant, Unarco Industries, Inc., and requests that the Defendant, Unarco Industries, Inc., within 30 days after service of this request make the following admissions under oath, or if all or any part of these Requests for Admissions are denied that the Defendant, Unarco Industries, Inc., set forth in detail under oath the reasons why it cannot truthfully admit the truth of these matters.

REQUEST FOR ADMISSION NO. 1

Admit that Exhibit A, Report of Investigation, dated November 12, 1940, attached hereto is a true and correct copy of the original of Exhibit A.

INTERROGATORY NO. 1

If your response to Request for Admission No. 1 is in the negative please state in detail your reasons for such response.

REQUEST FOR ADMISSION NO. 2

Admit that Exhibit A attached hereto is an authentic document.

INTERROGATORY NO. 2

If your response to Request for Admission No. 2 is in the negative please state in detail your reasons for such response.

REQUEST FOR ADMISSION NO. 3

Admit that the original of Exhibit A attached hereto was authored by McKenna & Harris.

INTERROGATORY NO. 3

If your response to Request for Admission No. 3 is in the negative please state in detail your reasons for such negative response, and state who, to your knowledge, did in fact author Exhibit A, attached.

REQUEST FOR ADMISSION NO. 4

Admit that the original of Exhibit A attached hereto was prepared by McKenna & Harris in the ordinary course of their duties as an employee or employees of Unarco Industries, Inc.

INTERROGATORY NO. 4

If your response to Request for Admission No. 4 is in the negative please state in detail your reasons for such negative response, and state exactly what the relationship between Defendant Unarco Industries, Inc. and McKenna & Harris is.

REQUEST FOR ADMISSION NO. 5

Admit that Exhibit A attached hereto was circulated within the corporate structure of Unarco Industries, Inc.

INTERROGATORY NO. 5

If your response is in the negative to Request for Admission No. 5 please state in detail your reasons for such negative response.

REQUEST FOR ADMISSION NO. 6

Admit that McKenna & Harris were, in 1940, agents, servants, employees, officers, or directors of Unarco Industries, Inc.

INTERROGATORY NO. 6

If your response to Request for Admission No. 6 is in the negative please state in detail your reasons for such negative response, and explain exactly what relationship McKenna and Harris had to Defendant Unarco Industries, Inc. in 1940.

INTERROGATORY NO. 7

Identify McKenna & Harris as to whether they are individuals, a business firm, a corporation, consultants, attorneys, insurers, or other and state their association with Unarco Industries, Inc., in 1940.

INTERROGATORY NO. 8

Do you know if the original of Exhibit A attached hereto is in existence?

INTERROGATORY NO. 9

If your response to Interrogatory No. 8 is in the affirmative, please state:

1. Who has custody, control or possession of the original of Exhibit A attached hereto.
2. The present location of the original of Exhibit A attached hereto.

INTERROGATORY NO. 10

State the full name, last known address, and relationship to Defendant Unarco, Industries, Inc., of the "Dr. Cowan" referred to in Exhibit A.

INTERROGATORY NO. 11

Identify by occupation and relationship to Defendant Unarco Industries, Inc., the people described in Exhibit A as "Messrs. Balch, Fehrs and Cahill", and their last known address.

INTERROGATORY NO. 12

Identify by occupation and relationship to Defendant Unarco Industries, Inc., the person described in Exhibit A as "James Bennett".

REQUEST FOR ADMISSION NO. 7

Admit that Exhibit B, Report of Investigation, dated November 28, 1940, attached hereto is a true and correct copy of the original of Exhibit B.

INTERROGATORY NO. 13

If your response to Request for Admission No. 7 is in the negative please state in detail your reasons for such response.

REQUEST FOR ADMISSION NO. 8

Admit that Exhibit B attached hereto is an authentic document.

INTERROGATORY NO. 14

If your response to Request for Admission No. 8 is in the negative please state in detail your reasons for such response.

REQUEST FOR ADMISSION NO. 9

Admit that the original of Exhibit B attached hereto was authored by McKenna & Harris.

INTERROGATORY NO. 15

If your response to Request for Admission No. 9 is in the negative please state in detail your reasons for such negative response, and state who, to your knowledge, did in fact author Exhibit B, attached.

REQUEST FOR ADMISSION NO. 10

Admit that the original of Exhibit B attached hereto was prepared by McKenna & Harris in the ordinary course of their duties as an employee or employees of Unarco Industries, Inc.

INTERROGATORY NO. 16

If your response to Request for Admission No. 10 is in the negative please state in detail your reasons for such negative response.

REQUEST FOR ADMISSION NO. 11

Admit that Exhibit B attached hereto was circulated

within the corporate structure of Unarco Industries, Inc.

INTERROGATORY NO. 17

If your response is in the negative to Request for Admission No. 11 please state in detail your reasons for such negative response.

INTERROGATORY NO. 18

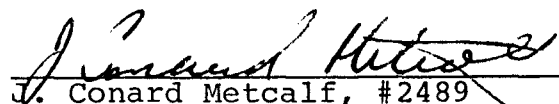
Do you know if the original of Exhibit B attached hereto is in existence?

INTERROGATORY NO. 19

If your response to Interrogatory No. 18 is in the affirmative, please state:

1. Who has custody, control or possession of the original of Exhibit B attached hereto.
2. The present location of the original of Exhibit B attached hereto.

WILLIAMS, TRINE, GREENSTEIN,
& GRIFFITH, P.C.


J. Conard Metcalf, #2489
1435 Arapahoe Avenue
Boulder, Colorado 80302
442-0173

CERTIFICATE OF MAILING

I hereby certify that on this 12th day of September, 1979, I deposited in the United States Mail, postage prepaid, a true and correct copy of the foregoing PLAINTIFF'S INTERROGATORIES AND REQUESTS FOR ADMISSIONS TO THE DEFENDANT, UNARCO INDUSTRIES, INC., (September 12, 1979) to Marc R. Brosseau, Esq., Weller, Friedrich, Hickisch & Hazlitt, 900 Capitol Life Center, 225 E. 16th Avenue, Denver, Colorado 80203.



November 12, 1940

REPORT OF INVESTIGATION

RE: UNION ASBESTOS & RUBBER COMPANY - JAMES BENNETT

On Tuesday, October 29th or Wednesday, October 30th, the Union Asbestos called Mr. McKenna relative to the case of James Bennett, one of their employees who apparently had developed a condition that put him in such shape that it was not thought safe for him to continue in their employ. This is an asbestosis case and it appears that Dr. Cowen had told the Company that some action had better be taken with Jimmie Bennett.

On Wednesday, October 30th, I went out to the Union Asbestos and had a long talk with Messrs. Balch, Fehrs and Cahill. I got from them a kind of a summary what the situation was and then I told them that I would arrange to talk the matter over personally with Dr. Cowen and on Thursday, October 31st, I spent most of the afternoon with Dr. Cowen at his office down on the South Side and he explained this case to me in great detail.

The next day, therefore, I went back to the Union Asbestos and again went over the whole situation in the light of what Dr. Cowen advised me, which briefly is that this man has developed two spots in the apices of his lung, which indicate active tuberculosis. He also has a very extensive fibrosis in his lung and Dr. Cowen told me that he simply would not be responsible for what happened if Jimmie continued to work there and that in addition to that, he was a hazard to other employees. He said that it was imperative that he be taken out of active work immediately - not only for his sake but also for that of other employees.

I will not write a book about all that Dr. Cowen told me about the man's condition as I understand it pretty well. By a previous arrangement, I went out to the Union Asbestos again on Friday, November 1st, at their plant in Cicero. By that time, the matter had been discussed with Mr. Silverman and it was agreed that we had better try to get a settlement with this man just as quickly as possible and the Company had authorized me to see what I could do about negotiating with this man and paying him up to \$2500 and possibly \$3000 if necessary. I made an arrangement with Dr. Cowen and on Thursday, October 31st, I met Dr. Cowen out at the Union Asbestos where various phases of the case were gone into at very great lengths and I made an appointment with Mr. Cahill, Foreman of the Department in which Bennett works, and this appointment was to go to the home of Jimmie Bennett about 6 o'clock on the evening of Friday, November 1st.

EXHIBIT A

Report - 2

11/12/40

Re: Union Asbestos - James Bennett

Mr. Cahill and I spent about two hours with Jimmie in his home in Cicero. At this time I explained Jimmie's situation to him at quite some lengths. It was a very delicate proposition to put to Jimmie but I understood that the fact that he was losing ground physically was no surprise to him. He has been losing weight; he knew it; he knew that his vigor was diminishing and that it was a little more difficult to keep up; and insofar as that phase of the case is concerned, he was a little relieved that the Company had come to him rather than his having to go to the Company about the matter. Dr. Cowen advised that Jimmie be confined to a sanitarium and inasmuch as he lives in Cicero, it would have to be Oak Forest as only residents of the City of Chicago can be admitted to the Municipal Tuberculosis Sanitarium.

It was quite a difficult task broaching this to Jimmie Bennett, but I believe that the result was very successful. I told Jimmie that we would pay him \$2500 cash and that we would use our influence in getting him into Oak Forest if he desired it and the Company also offered to give his wife a job in the Packing Department or some other Department where she had previously worked, as soon as a vacancy occurred, and I indicated to her that we might be able to do this right away. It came out then, of course, after a while, that Jimmie wanted to think it over and I wanted him to think it over, and I agreed on behalf of the Company to pay him a week's salary during the period that he was to think it over, and I told him that he must cease work immediately and commence a period of rest that he so definitely required and that that period of rest must start immediately.

I, of course, had to talk to Jimmie Bennett with the utmost care - first, not to alarm him and second, talk to him in such a way that he wouldn't fly into the hands of an attorney and third, I had to sell more or less the idea to his wife also. All together, it was treading on pretty thin ice. The results so far have been highly satisfactory. I arranged with Jimmie that evening for him to go and visit Dr. Cowen at his office on the South Side and, of course, I had planned to talk to Dr. Cowen in advance and tell him what arrangement I had made with Jimmie and what I had said to him and have him assist us in the matter. That is the way we left it when I left Jimmie Bennett's home on the night of Friday, November 1st.

On Monday, November 4th, I went out to the Union Asbestos plant in Cicero and explained in some detail to Mr. Balch what Mr. Cahill and I had done the Friday evening before, and while I was there, I got Dr. Cowen on the long distance telephone and in Mr. Balch's

Report - 3

11/12/40

Re: Union Asbestos - James Bennett

office talked to Dr. Cowen so Dr. Cowen was prepared to receive James Bennett and he knows more or less of the proposition offered to Jimmie Bennett. The outcome of Dr. Cowen's talk with Jimmie Bennett has not yet been reported to me. This is a case, as I view it, that we cannot under any circumstances even attempt to settle with Jimmie Bennett for less than \$2500 as the Industrial Commission undoubtedly would not approve it. With all things considered, if we did pay Jimmie Bennett \$2500, that is probably as much as he would get if he went to some attorney with it, and furthermore he would get it now; get the good will of the Company and their cooperation; he would not have to go through the ordeal of a trial; his opportunity to rest would commence immediately and perhaps in a year and a half or two years, Jimmie will be rehabilitated and built up to a point where he will no longer be inactive or an active tuberculosis case and by that time he might well be an arrested case. Bennett, of course, is more interested in what he is going to do after he becomes an arrested case or after he recovers. That was a pretty ticklish problem and I was unable to guarantee that the Company would give him a job. They might be willing, however, to give him a job in a non-dusty department and that possibility is still in the offing.

The original suggestion to us about this case came from the Union Asbestos by telephone and as far as I know no letter has been received from the Union Asbestos about the case, and this memorandum is even the first kind of a memorandum or note in writing that we are handling this case. From the foregoing, of course, it will be noted that all of the officials of the Union Asbestos and Rubber Company know about it and it has been agreed that I will keep in very close touch with the developments and will not let it get more than a few days older than I should like it to get because I am expecting that Jimmie Bennett will probably want to talk to me again in the next few days.

MS

November 28, 1940

REPORT OF INVESTIGATION

RE: JAMES BENNETT vs UNION ASBESTOS AND RUBBER COMPANY

Since my memo of November 12th was written, I have spent considerable time on this case, including a conference with Mr. Silverman, Mr. Balch and Dr. Cowen in Mr. Silverman's office in the Company's downtown office at 310 South Michigan. I also have seen Jimmie Bennett at his home six or seven times during that period and have had several conferences with Dr. Cowen also. I had quite a little difficulty to iron out, consisting principally of the circumstance that Bennett did not want to settle his case with the Company without an assurance or agreement or promise of some kind that the Company would re-employ him if he recovered his health. This was a very difficult proposition from the Company standpoint on account of their contract with the Union and the various conflicting departmental seniority rules and has been a sore spot and one of great difficulty in the Company's organization for quite some time, and also because the Company felt it imperative that the time had come for a showdown and they could no longer continue to employ on "pensioner jobs" and more or less disabled to the extent that they were not able to work in the weaving, carding, sitting, etc. departments. Furthermore, the Company, we did not feel, could make Bennett an outright promise to re-hire him under his former arrangement or his seniority and the entire negotiations presented a rather ticklish situation and one which looked on a number of days as though it might result in an unhappy ending.

However, they were able to compromise the difficulty and in the process, I was obliged to concede an additional \$250 payment to Jimmie Bennett, principally in order that he would have a little extra money to defray his expenses such as moving, clothing himself and his family and such things as he was going to need to move to Texas where he has been advised by his doctor to go, to live in a more equable climate for the next year or so at least. Bennett also had had himself examined and x-rayed by a doctor of his own choice. He consulted a Dr. Weisskopf, who sent him to the St. Anthony De Padua Hospital where he was given an x-ray examination by a roentgenologist named Tichy. Jimmie let me read this report but he refused steadfastly until after the hearing was over to let me make a copy of that report. I now have it in my possession and am making copies of it for the Company's file and also for Dr. Cowen and the original is going to be, as per promise which I made to Jimmie, returned to him by mail.

I came to a final agreement with Jimmie on Monday, November 25th and on that day I talked with Mr. Silverman twice; I went out to the plant to see Mr. Balch; got the various records of Jimmie's employment; I talked to Mr. Bennett three times that day and in the very late afternoon, finally concluded the arrangement with Bennett at his home at 3107 South 53rd Avenue in Cicero, Illinois and at that

EXHIBIT B

REPORT -2

11/28/40

Re: Bennett vs. Union Asbestos

time arranged with Bennett to be down in the office on Thursday morning, November 28th.

Today, November 28th, after having had the Settlement Contract, Lump Sum Petition, etc., prepared, I went over to the Industrial Commission with Bennett, I laid the whole case before Commissioner Hummert who fully explained Bennett's rights to him, and Mr. Bennett in accordance with the many conferences that I had had with him and his wife at his home, told Commissioner Hummert that he was satisfied with the settlement and the Settlement Contract was, after considerable talk between Bennett and Commissioner Hummert, approved by Commissioner Hummert and the approved Settlement Contract and Lump Sum Petition are attached hereto. I also attach hereto Receipts which I took from Jimmie and I gave Mr. Bennett, the Union Asbestos and Rubber Company's check in the sum of \$2750, payable to him. Mr. Bennett got just a little bit skiddish at the Industrial Commission when Mr. Hummert went on at quite some lengths to suggest that if Bennett got worse, he still would have no recourse against the Company. The case presented quite a few ticklish features throughout the entire period of negotiations but it is now settled, the Settlement Contract is approved, the Lump Sum Petition has been approved and it is paid and the case may now be closed.

MS

Encs.

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO

IN RE ASBESTOS CASES

INTERROGATORIES TO DEFENDANT UNARCO INDUSTRIES, INC.
(September 22, 1981)

JOHNSON- Case No. 80-CV-0942-2	)	
KRIEGER- Case No. 79-CV-1774-2	)	IN RE CASE NO. 79-CV-1774-2D
PANTHER- Case No. 79-CV-0559-2	)	
AMON - Case No. 80-CV-2138-2	)	
DANIEL - Case No. 80-CV-1577-2	)	IN RE CASE NO. 80-CV-1577-2D
JACKSON	)	CASE NO. 81-CV-1339-2
SWAN	)	CASE NO. 81-CV-0520-2

Plaintiffs,

v.

JOHNS-MANVILLE SALES CORPORATION (successor by merger to
JOHNS-MANVILLE PRODUCTS CORPORATION, et al.,

Defendants.

CERTIFICATE OF MAILING

I hereby certify that on this 23rd day of September, 1981,
I deposited in the United States Mail, postage prepaid, a true and
correct copy of the foregoing INTERROGATORIES TO DEFENDANT UNARCO
INDUSTRIES, INC., (September 22, 1981) to Marc R. Brosseau, Esq., and a copy
of the Court transmittal letter only

to the following Attorneys of Record in Civil Action No. 80-CV-0942-2,
LAVERNE R. JOHNSON, Executrix of the Estate of Harold W. Johnson and LAVERNE JOHNSON
v. JOHNS-MANVILLE SALES CORPORATION, et al.

JOHNS-MANVILLE SALES CORP. &
JOHNS-MANVILLE CORPORATION:

Bruce F. Fest, Esq.
Wood, Ris and Hames
518 17th Street, Suite 1100
Denver, CO 80202

FIBREBOARD CORPORATION:

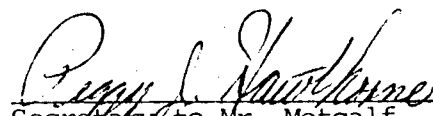
Kenneth Groves, Esq.
225 East 16th Avenue, Suite 1000
Denver, CO 80203

RAYBESTOS-MANHATTAN, INC.:

Duncan W. Cameron, Esq.
Hall and Evans
717 17th Street, Suite 2900
Denver, CO 80202

UNARCO INDUSTRIES, INC.:

Marc R. Brosseau, Esq.
Weller, Friedrich, Hickisch & Hazlitt
225 East 16th Avenue, Suite 900
Denver, CO 80203


Secretary to Mr. Metcalf

CERTIFICATE OF MAILING

I hereby certify that on this 23rd day of September, 1981,
I deposited in the United States Mail, postage prepaid, a true and
correct copy of the foregoing INTERROGATORIES TO DEFENDANT UNARCO
INDUSTRIES, INC. (September 22, 1981) to Marc R. Brosseau, Esq., and a copy
of the Court transmittal letter only

to the following Attorneys of Record in Civil Action No. 79-CV-1774-2,
DONALD L. KRIEGER v. JOHNS-MANVILLE PRODUCTS CORP., et al.:

JOHNS-MANVILLE PRODUCTS CORP. &
JOHNS-MANVILLE CORPORATION:

Bruce F. Fest, Esq.
Wood, Ris and Hames
518 17th Street, Suite 1100
Denver, CO 80202

ARMSTRONG CORK COMPANY:

Ronald H. Shear, Esq.
Tilly and Graves
50 So. Steele St., Suite 800
Denver, CO 80209

THE CELOTEX CORPORATION:

Donald E. LaMora, Esq.
430 North Tejon, Suite 303
Colorado Springs, CO 80903

COMBUSTION ENGINEERING, INC., &
PITTSBURGH CORNING CORP.:

William J. Madden, Esq.
Madden and Strate
2201 Kipling Street
Denver, CO 80215

EAGLE Picher INDUSTRIES &
THE KEENE CORPORATION:

Jack Kent Anderson, Esq.
DeMulin, Anderson, Campbell & Laugesen
6780 East Hampden Avenue
Denver, CO 80224

FIBREBOARD CORPORATION:

Kenneth Groves, Esq.
225 E. 16th Avenue, Suite 1000
Denver, CO 80203

48-INSULATION, INC.:

C. Willing Browne, Esq.
Gorsuch, Kirgis, Campbell, Walker
& Grover
818 17th Street, Suite 1200
Denver, CO 80202

GAF CORPORATION: (Settled 6-11-81)

METROPOLITAN LIFE INSURANCE CO.:

Eric Peterson, Esq.
White & Steele, P.C.
1660 Lincoln Street, Suite 1660
Denver, CO 80264

NICOLET INDUSTRIES:

Larry Blackman, Esq.
Greengard, Blackman & Senter
50 South Steele Street, Suite 700
Denver, CO 80209

OWENS-CORNING FIBERGLAS CORPORATION:

David Higgins, Esq.
Long and Jaudon
717 17th Street, Suite 1580
Denver, CO 80202

OWENS-ILLINOIS GLASS COMPANY:

John R. Rodman, Esq.
Paul D. Renner, P.C.
50 South Steele, Suite 777
Denver, CO 80209

RAYBESTOS-MANHATTAN, INC.:

Duncan W. Cameron, Esq.
Hall and Evans
717 17th Street, Suite 2900
Denver, CO 80202

THE RYDER COMPANY, INC.:
(now RYDER INDUSTRIES, INC.):

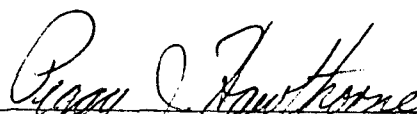
Gary L. Palumbo, Esq.
Bayer, Carey & McGee, P.C.
818 17th Street, Suite 622
Denver, CO 80202

STANDARD ASBESTOS MANUFACTURING
& INSULATING COMPANY:

Albert E. Zarlengo, Jr., Esq.
Zarlengo, Mott and Zarlengo
210 St. Paul Street, Suite 200
Denver, CO 80206

UNARCO INDUSTRIES, INC.:

Marc R. Brosseau, Esq.
Weller, Friedrich, Michlisch & Hazlitt
225 East 16th Avenue, Suite 900
Denver, CO 80203


Secretary to Mr. Metcalf

CERTIFICATE OF MAILING

I hereby certify that on this 23rd day of September, 1981,
I deposited in the United States Mail, postage prepaid, a true and
correct copy of the foregoing INTERROGATORIES TO DEFENDANT UNARCO
INDUSTRIES, INC. (September 22, 1981) to Marc R. Brosseau, Esq., and a copy
of the Court transmittal letter only

to the following Attorneys of Record in Civil Action No. 79-CV-0559-2,
MALCOLM J. PANIHER v. JOHNS-MANVILLE PRODUCTS CORPORATION, et al.

JOHNS-MANVILLE PRODUCTS CORP.:

Bruce F. Fest, Esq.
Wood, Ris and Hames
518 17th Street, Suite 1100
Denver, CO 80202

FIBREBOARD CORPORATION:

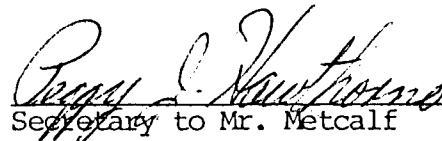
Kenneth Groves, Esq.
225 East 16th Avenue, Suite 1000
Denver, CO 80203

RAYBESTOS-MANHATTAN, INC.:

Duncan W. Cameron, Esq.
Hall and Evans
717 17th Street, Suite 2900
Denver, CO 80202

UNARCO INDUSTRIES, INC.:

Marc R. Brosseau, Esq.
Weller, Friedrich, Hickisch & Hazlitt
225 East 16th Avenue, Suite 900
Denver, CO 80203


Secretary to Mr. Metcalf

CERTIFICATE OF MAILING

I hereby certify that on this 23rd day of September, 19 81,
I deposited in the United States Mail, postage prepaid, a true and
correct copy of the foregoing INTERROGATORIES TO DEFENDANT UNARCO
INDUSTRIES, INC. (September 22, 1981) to Marc R. Brosseau, Esq., and a copy
of the Court transmittal letter only

to the following Attorneys of Record in Civil Action No. 80-CV-2138-2,
OLIVER DUANE AMON v. JOHNS-MANVILLE SALES CORPORATION, et al.

JOHNS-MANVILLE SALES CORP. &
JOHNS-MANVILLE CORPORATION:

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Wood, Ris and Hames
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Denver, CO 80202

THE CELOTEX CORPORATION:

Donald E. LaMora, Esq.
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Colorado Springs, CO 80903

COMBUSTION ENGINEERING, INC. &
PITTSBURGH CORNING CORP.:

William J. Madden, Esq.
Madden and Strate
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EAGLE PICHER INDUSTRIES &
THE KEENE CORPORATION:

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FIBREBOARD CORPORATION:

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48-INSULATION, INC.:

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818 17th Street, Suite 1200
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METROPOLITAN LIFE INSURANCE CO.:

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NICOLET, INC.:

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OWENS-ILLINOIS GLASS COMPANY:

John R. Rodman, Esq.
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RYDER INDUSTRIES, INC.:

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Watson, Nathan & Bremer, P.C.
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Denver, CO 80202

STANDARD ASBESTOS MFG. & INSL. CO.:

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UNARCO INDUSTRIES, INC.:

Marc R. Brosseau, Esq.
Weller, Friedrich, Hickisch & Hazlitt
225 East 16th Avenue, Suite 900
Denver, CO 80203


Secretary to Mr. Metcalf

CERTIFICATE OF MAILING

I hereby certify that on this 23rd day of September, 1981,
I deposited in the United States Mail, postage prepaid, a true and
correct copy of the foregoing INTERROGATORIES TO DEFENDANT UNARCO INDUSTRIES, INC.
(September 22, 1981) to Marc R. Brosseau, Esq., and a copy of the Court transmittal
letter only

to the following Attorneys of Record in Civil Action No. 80-CV-1577-2,
Lyle Daniel and Elizabeth Daniel v. Johns-Manville Corp., et al.:

For Johns-Manville Corporation: For Unarco Industries, Inc.

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Weller, Friedrich, Hickisch & Hazlitt
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Peggy L. Hawthorne

CERTIFICATE OF MAILING

I hereby certify that on this 23rd day of September, 19 81,
I deposited in the United States Mail, postage prepaid, a true and
correct copy of the foregoing INTERROGATORIES TO DEFENDANT UNARCO
INDUSTRIES, INC. (September 22, 1981) to Marc R. Brosseau, Esq., and a copy
of the Court transmittal letter only

to the following Attorneys of Record in Civil Action No. 81-CV-1339-2,
HAROLD JACKSON v. JOHNS-MANVILLE SALES CORPORATION, et al. :

JOHNS-MANVILLE SALES CORPORATION &
JOHNS-MANVILLE CORPORATION:

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Denver, CO 80202

48-INSULATION, INC.:

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ARMSTRONG CORK COMPANY:

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EAGLE PICHER INDUSTRIES, INC. &
THE KEENE CORPORATION:

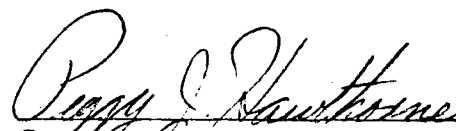
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Denver, CO 80203

FIBREBOARD CORPORATION:

Kenneth Groves, Esq.
225 E. 16th Avenue - Suite 1000
Denver, CO 80203


Secretary to Mr. Metcalf

CERTIFICATE OF MAILING

I hereby certify that on this 23rd day of September, 1981,
I deposited in the United States Mail, postage prepaid, a true and
correct copy of the foregoing INTERROGATORIES TO DEFENDANT UNARCO INDUSTRIES,
INC. (September 22, 1981) to Marc R. Brosseau, Esq., and a copy of the Court
transmittal letter only

to the following Attorneys of Record in Civil Action No. 81-CV-0520-2,
BILLIE JOE SWAN AND JO ANN SWAN v. JOHNS-MANVILLE SALES CORP., et al.

JOHNS-MANVILLE SALES CORP. &
JOHNS-MANVILLE CORPORATION:

Bruce F. Fest, Esq.
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THE CELOTEX CORPORATION:

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EAGLE PICHER INDUSTRIES, INC. &
THE KEENE CORPORATION:

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ROCK WOOL MANUFACTURING COMPANY:

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RYDER INDUSTRIES, INC.:

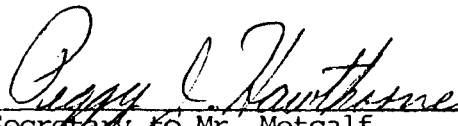
Anne Smith Myers, Esq.
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Denver, CO 80203


Secretary to Mr. Metcalf

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO
IN RE ASBESTOS CASES NO. 79-CV-1774-2D

- *Panther P*

DEFENDANT UNARCO'S RESPONSES TO PLAINTIFF'S INTERROGATORIES
AND REQUESTS FOR ADMISSIONS (SEPTEMBER 12, 1979).

COMES NOW defendant Unarco Industries, Inc., by and through its attorneys, Weller, Friedrich, Hickisch and Hazlitt, and objects to each and every one of the Interrogatories and Requests on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of relevant information.

WELLER, FRIEDRICH, HICKISCH &
HAZLITT

BY

Marc R. Brosseau

Marc R. Brosseau, #7415
Attorneys for Defendant
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900 Capitol Life Center
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861-8000

CERTIFICATE OF MAILING

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I hereby certify that on this 23rd day of November, 1981, I deposited in the United States mail, postage prepaid, a true and correct copy of the foregoing DEFENDANT UNARCO'S RESPONSES TO PLAINTIFF'S INTERROGATORIES AND REQUESTS FOR ADMISSIONS (SEPTEMBER 12, 1979), to the above listed individuals.

Cindy Beltzer

JAN 8 1982

Johnson
~~*[Signature]*~~
~~*[Signature]*~~

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO

IN RE ASBESTOS CASES NO. 79-CV-1774-2D

DEFENDANT UNARCO'S RESPONSES TO PLAINTIFFS' SECOND SET
OF INTERROGATORIES.

COMES NOW defendant Unarco Industries, Inc., by and through its attorneys Weller, Friedrich, Hickisch & Hazlitt and hereby objects to each of the Interrogatories and plaintiff Johnson's Second Set of Interrogatories to All Defendants on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of relevant information.

WELLER, FRIEDRICH, HICKISCH & HAZLITT

BY

Marc R. Brosseau

Marc R. Brosseau, #7415
Attorneys for Unarco Industries, Inc.
900 Capitol Life Center
Denver, Colorado 80203
861-8000

CERTIFICATE OF MAILING

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J. Conard Metcalf, Esq.
Attorneys for Plaintiff
1435 Arapahoe Avenue
Boulder, Colorado 80302

I hereby certify that on this 5th day of January, 1982, I deposited in the United States Mail, postage prepaid, a true and correct copy of the foregoing DEFENDANT UNARCO'S RESPONSES TO PLAINTIFFS' SECOND SET OF INTERROGATORIES, to the above listed individuals.

Cindy Beltzer

1982
FEB 01 1982

Unarco
Unarco

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO
IN RE ASBESTOS CASES NO. 80-CV-1577-2D

DEFENDANT UNARCO'S RESPONSES TO PLAINTIFF'S INTERROGATORIES
(SEPTEMBER 22, 1981)

Defendant Unarco Industries, Inc., responds to plaintiff's interrogatories as follows:

INTERROGATORY 1. Was/were Defendant(s) sued by anyone not a direct employee before 1964 who alleged disease, injury or damage (including the death of another) from inhalation of asbestos fibers while applying, working with or near insulation products after said products had been manufactured and sold; in other words, the kind of work that would be done by an insulation applicator or industrial, commercial or maritime products?

ANSWER 1. No.

INTERROGATORY 2. If so, state (for each such defendant) for each such instance:

- a. The date the suit was filed.
- b. The date you had notice of it.
- d. The names of all plaintiffs.
- e. The name of the court in which the case was filed originally and the action or docket number assigned to the case.
- f. The name of any court to which the case was removed and the action number or the docket number assigned to the case in that court.
- g. Remand.
- h. The names of all attorneys signing pleadings for all the plaintiffs, and the attorney's addresses.
- i. The names of all attorneys signing pleadings for all the defendants, and the attorney's addresses.
- j. If the case was settled before, during or after trial, the date of settlement and amount paid to the plaintiff, if any, in settlement.
- k. If the case was tried and a verdict rendered, the party in whose favor the verdict was rendered and, if in favor of the plaintiff the dollar amount of the verdict.
- l. If the case (or cases) was settled, what investigation of plaintiff's claim or claims was undertaken prior to settling each such case.

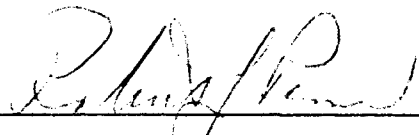
- settling each such case.
- m. The name and last known address of each expert retained by you in each such case and each expert's area of expertise (e.g., pulmonary medicine, occupational medicine, industrial hygiene, safety engineering, epidemiology, public health, atmospheric sampling, and the like).

ANSWER 2: Not applicable.

State of Illinois)
) ss
County of Cook)

Robert J. Penn, being first duly sworn according to the law, states that the information set forth herein, based upon his information and belief, is true and accurate.

Unarco Industries, Inc.

By 
Robert J. Penn

Sworn and subscribed before me this 22nd day of JANUARY, 1982.


Notary Public

MY COMMISSION EXPIRES Nov. 27, 1983

CERTIFICATE OF MAILING

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J. Conard Metcalf, Esq.
1435 Arapahoe Avenue
Boulder, Colorado 80203

I hereby certify that on this 28th day of January
1982, I deposited in the United States mail, postage
prepaid, a true and correct copy of the foregoing
DEFENDANT UNARCO'S RESPONSE TO PLAINTIFF'S INTERROGATORIES
(SEPTEMBER 22, 1981) to the above listed individuals.

Cindy Beltyer

UNARCO
ANSWERS

2-2-82

*His name is
Kueper -
Pantner -*

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO

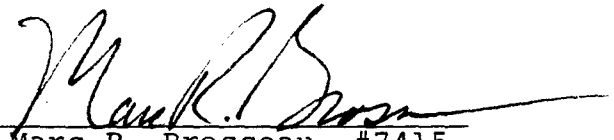
IN RE ASBESTOS CASES NO. 79-CV01774-2D

DEFENDANT UNARCO'S RESPONSES TO PLAINTIFFS' FIRST SET OF
INTERROGATORIES TO ALL DEFENDANTS EXCEPT METROPOLITAN
LIFE

COMES NOW defendant Unarco Industries, Inc., by
and through its attorneys Weller, Friedrich, Hickisch &
Hazlitt, and in response to Plaintiffs' First Set of Interrog-
atories to All Defendants Except Metropolitan Life incor-
porates as though fully set forth herein its Responses to
Plaintiffs' First Set of Interrogatories to All Defendants
Except Metropolitan Life, 80-CV-1577-2D, filed February 1,
1982.

WELLER, FRIEDRICH, HICKISCH &
HAZLITT

By



Marc R. Brosseau, #7415
Attorneys for Unarco
900 Capitol Life Center
225 East 16th Avenue
Denver, Colorado
861-8000

CERTIFICATE OF MAILING

I hereby certify that on this 2nd day of February, 1982, I deposited in the United States mail true and correct copies of the foregoing DEFENDANT UNARCO'S RESPONSES TO PLAINTIFFS' FIRST SET OF INTERROGATORIES TO ALL DEFENDANTS EXCEPT METROPOLITAN LIFE, to the following individuals:

J. Conard Metcalf, Esq.
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& Griffith
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Boulder, CO 80302

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Denver, Colorado 80202

Cindy Beltzer

UNARCO ANSWERS

82
FEB 03 REPT

James -
10-1-82

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO

IN RE ASBESTOS CASES NO. 80-CV-1577-2D

DEFENDANT UNARCO'S REPOSSES TO PLAINTIFFS' FIRST SET
OF INTERROGATORIES TO ALL DEFENDANTS EXCEPT METROPOLITAN
LIFE.

Defendant Unarco Industries, Inc., responds to plaintiffs' interrogatories response to plaintiffs' interrogatories as follows:

INTERROGATORY 1: Do you or your subsidiary, division, or predecessor in interest now manufacture, distribute or sell products used for thermal insulation which contain asbestos?

a. Please state the name, address and position or title of employment of all persons supplying information or material used in answering any part of this Interrogatory or who was consulted with regard to information used in answering any part of this Interrogatory.

b. Please list and itemize each and every document or written or printed matter or other tangible item which was read examined, consulted, reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and who the custodian is of each such document or written or printed matter or other tangible item.

RESPONSE 1: No.

INTERROGATORY 2: If your answer to Interrogatory No. 1 is affirmative, then please state the following:

a. Itemize and list each such product by the brand name, trade name or other designation under which each such product is or was sold.

b. State the name and address of each such subsidiary, division, or predecessor in interest which manufactures, distributes or sells such product.

c. State the date each such product was first manufactured, distributed or sold.

d. State the composition of each such product, listing the approximate percentage of each ingredient and, if one ingredient is diatomaceous earth, whether that diatomaceous earth is untreated (raw), calcined or flux calcined.

e. State the name, address and what position or title of employment of each person supplying information or material used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any part of this Interrogatory.

f. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production, each and every document or written or printed matter or other tangible item which was read, examined, consulted, reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed material or other tangible item.

RESPONSE 2: Not applicable.

INTERROGATORY 3: Have you or your subsidiary, division or predecessor in interest, in the past, manufactured, distributed or sold products used for thermal insulation which contained asbestos?

a. State the name, address and position or title of employment of each such person supplying information or material used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any part of this Interrogatory.

b. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production, each and every document or written or printed matter or other tangible item which was read, examined, consulted reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed matter or other tangible item.

RESPONSE 3: Yes.

a. Respondent objects to this sub-part of this interrogatory on the basis that it is overbroad, uncertain, irrelevant and not calculated to lead to the discovery of evidence admissible in this matter. However, without waiving the foregoing objections, these responses to interrogatories by Unarco Industries, Inc., have been verified on information and belief by Robert J. Penn, Vice President-Finance of Unarco Industries, Inc., 332 South Michigan Avenue, Chicago, Illinois 60604. Mr. Penn was not employed by the respondent while this defendant was engaged in the manufacture of asbestos containing products. Mr. Penn does not have any direct knowledge regarding these answers but is advised that such answers are supported by information and material which this respondent has been able to discover to date. All responses which this defendant is capable of giving at this time are derived from numerous persons and sources discovered during the course of this litigation.

- b. See the response to Interrogatory 3 a.

INTERROGATORY 4: If your answer to Interrogatory No. 3 is affirmative, then please state the following:

a. Itemize and list each such product by the brand name, trade name or other designation under which each such product was manufactured distributed, marketed or sold.

b. State the name and address of each subsidiary, division, or predecessor in interest which manufactured, distributed or sold each such product.

c. State the date each such product was first manufactured, distributed or sold, and the date each such product was last manufactured, distributed or sold.

d. State the composition of each such product, listing the approximate percentage of each ingredient and, if one ingredient is diatomaceous earth, whether that diatomaceous earth is untreated, (raw), calcined or flux calcined.

e. State the location where each such product was manufactured, the dates that each such product was manufactured, at each such location, and the geographical area where such products manufactured at these locations were sold or distributed.

f. State the name, address and what position or title of employment of each such person supplying information or materials used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any part of this Interrogatory.

g. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production, each and every document or written or printed matter or other tangible item which was read, examined, consulted reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed matter or other tangible item.

RESPONSE 4: See the attached Exhibit One and the Exhibit Two.

INTERROGATORY 5: Has, at any time, any entity other than you, your subsidiaries or divisions, ever manufactured, sold or distributed a product used for thermal insulation which contained asbestos, which product was sold and/or distributed under your own brand name, trade name or was otherwise sold or marketed as your product?

a. State the name, address and position or title of employment of each such person supplying information or material used in answering any part of the Interrogatory, or who was consulted with regard to information used in answering

any part of this Interrogatory.

b. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production each and every document or written or printed matter or other tangible item which was read, examined, consulted, reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed matter or other tangible item.

RESPONSE 5:

a. The Union Asbestos & Rubber Company was incorporated under the laws of the State of Illinois on March 19, 1918. On April 17, 1963, the company's name was changed to Unarco Industries, Inc., a Delaware corporation incorporated in May of 1970, continues to exist at this time.

Between 1918 and 1970 the company sold and manufactured various asbestos containing products. During 1954 the company disposed of certain manufacturing facilities that had earlier been involved in the manufacture of asbestos containing products. In 1962, a large part of the company's business dealing with the manufacture of asbestos containing products was sold. By 1970, Unarco Industries, Inc. had sold the remainder of its business dealing with the manufacture of asbestos containing products. Unarco Industries, Inc. has not manufactured asbestos containing products of any kind since 1970.

When the company disposed of its various manufacturing facilities that had earlier been involved in the manufacture of asbestos containing products, it was the company's usual practice to leave most of its records at the particular facility. Similarly, employees at a transferred facility generally were not retained in the company's employ. For these reasons and because of passage of time since the company ceased its involvement in the manufacture of asbestos containing products, Unarco Industries Inc., no longer has in its employ, to the best of its knowledge information and belief, any person or persons who have the knowledge necessary to respond directly to this interrogatory. The company no longer has in its possession or at its disposal, to the best of its knowledge, information and belief, records or documents which it may consult to develop the requested information.

b. See the response to interrogatory 5 a.

INTERROGATORY 6: If your answer to Interrogatory No. 5 is affirmative, then state the following:

a. The name and address of each such entity.

b. The date that each such entity first manufactured, sold or distributed such products and the date that each such entity last manufactured, sold or distributed such products.

c. The brand name, trade name or other designation, identifying name or mark under which each such product was sold, distributed or marketed.

d. Whether you, or your subsidiary or division had a written agreement with each or any such entity for the manufacture, sale or distribution of such products. If your answer to this sub-part is affirmative, state:

1) Whether you have copies of such agreements in your possession, custody or control;

2) The present location of the original or copies of such agreements; and,

3) The name and address of the custodian of the originals or copies of such agreements.

e. Please set forth verbatim the content of each such agreement, or in lieu of setting forth verbatim the content of each such agreement, attach copies of any and all such agreements to your answers to these Interrogatories.

f. State the composition of each such product, listing the approximate percentage of each such ingredient and, if one ingredient is diatomaceous earth, state whether it is untreated (raw), calcined or flux calcined.

g. State the name, address and position or title of employment of each person supplying information or material used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any part of this Interrogatory.

h. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production each and every document or written or printed matter or other tangible item which was read, examined, consulted, reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed matter or other tangible item.

RESPONSE 6: Respondent is informed and believes that on or about August 26, 1937, respondent entered into an agreement known as the Stonfelt Agreement with Johns-Manville Corporation. This agreement was modified on or about October 2, 1939. It is not now known when this agreement was terminated. The provisions of the agreement are not now known to the respondent. Respondent does not now have a copy of the agreement or its modifications.

Respondent is informed and believes that on or about November 23, 1935, the respondent entered into an agreement known as the Wovenstone Agreement with Johns-Manville Corporation. This agreement is believed to have been amended on

March 3, 1941, May 19, 1941, and December 4, 1944. It is not known when this agreement was terminated. The provisions of this agreement are not now known to the respondent. Respondent does not now have a copy of this agreement or its amendments.

Respondent is informed and believes that on or about February of 1951, an arrangement with Mundet Cork Corporation for the sale of certain of respondent's products to Mundet Cork Corporation for distribution by it to certain persons, firms or entities may have commenced. Respondent is informed and believes that in or about October 1957 respondent and Mundet Cork Company entered into an arrangement for the purchase and sale of certain products between the two companies. It is not now known when these arrangements were terminated. The specific terms of the arrangements, as they may have been modified from time to time, are not now known to the respondent. Respondent has not maintained documents or records with respect to these arrangements in the normal course of its business.

The respondent is informed and believes that on or about August 26, 1954, it entered into a contractual arrangement with Armstrong Cork Company for the purchase and sale of certain pipe covering and block. The respondent is informed and believes that this agreement was terminated on or about March 6, 1956.

The respondent is informed and believes that on or about August 1, 1957, the respondent and Eagle Picher Company entered into an agreement for the purchase and sale of certain products.

Documentation pertaining to each of the last above mentioned agreements as such documentation continues to exist to the respondent's knowledge may be viewed at the respondent's corporate offices on reasonable notice.

INTERROGATORY 7: Have you or your subsidiaries, divisions or predecessors in interest ever manufactured, sold or distributed products used for thermal insulation which contained asbestos, which product or products were sold, distributed or marketed under the brand name, trade name or otherwise designated as the product of some entity other than you, your subsidiaries, divisions or predecessors in interest?

a. State the name, address and position or title of employment of each person supplying information or material used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any of this Interrogatory.

b. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production each and every document or written or printed matter or other

tangible item which was read, examined, consulted, reviewed or used in any way in obtaining information and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed matter or other tangible item.

RESPONSE 7: Respondent is informed and believes that on or about August 26, 1937, respondent entered into an agreement known as the Stonefelt Agreement with Johns-Manville Corporation. This agreement was modified on or about October 2, 1939. It is not now known when this agreement was terminated. The provisions of the agreement are not now known to the respondent. Respondent does not now have a copy of the agreement or its modifications.

Respondent is informed and believes that on or about November 23, 1935, the respondent entered into an agreement known as the Wovenstone Agreement with Johns-Manville Corporation. This agreement is believed to have been amended on March 3, 1941, and December 4, 1944. It is not now known when this agreement was terminated. The provisions of this agreement are not now known to the respondent. Respondent does not now have a copy of this agreement or its amendments.

Respondent is informed and believes that in or about February of 1951 an arrangement with Mundet Cork Corporation for the sale of certain of respondent's products to Mundet Cork Corporation for distribution by it to certain persons, firms or entities may have commenced. Respondent is informed and believes that in or about October of 1957 respondent and Mundet Cork Company entered into an arrangement for the purchase and sale of certain products between the two companies. It is not now known when these arrangements were terminated. The specific terms of the arrangements, as they may have been modified from time to time, are not now known to the respondent. Respondent has not maintained documents or records with respect to these arrangements in the normal course of its business.

The respondent is informed and believes that on or about August 26, 1954, it entered into a contractual arrangement with Armstrong Cork Company for the purchase and sale of certain pipe covering and block. The respondent is informed and believes that this agreement was terminated on or about March 6, 1956.

The respondent is informed and believes that on or about August 1, 1957, the respondent and Eagle Picher Company entered into an agreement for the purchase and sale of certain products.

Documentation pertaining to each of the last above mentioned agreements as such documentation continues to exist to the respondent's knowledge may be viewed at the respondent's corporate offices on reasonable notice.

INTERROGATORY 8: If your answer to Interrogatory No. 7 is in the affirmative, then state the following:

a. The name and address of each such entity.
b. The date that each such entity first manufactured sold, or distributed such products and the date that each such entity last manufactured, sold or distributed such products.

c. The brand name, trade name or other designation, identifying name, or mark under which each such product was sold, advertised, distributed or marketed.

d. Whether you, or your subsidiary or division, had a written agreement with each or any such entity for the manufacture, sale or distribution, of such products. If your answer to this sub-part (d) is affirmative, state:

1) Whether you have copies of such agreements in your possession, custody or control;

2) The present location of the original or copies of such agreements; and,

3) The name and address of the custodian of the originals or copies of such agreements.

e. Please set forth verbatim the content of each such agreement or, in lieu of setting forth verbatim the content of each such agreement, attach copies of any and all such agreements to your answers to these Interrogatories.

f. State the composition of each such product, listing the approximate percentage of each such ingredient and, if one ingredient is diatomaceous earth, state whether it is untreated (raw), calcined, or flux calcined.

g. State the name, address and what position or title of employment of each person supplying information, or material used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any part of this Interrogatory.

h. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production, each and every document or written or printed matter or other tangible item which was read, examined consulted, reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document

or written or printed matter or other tangible item.

RESPONSE 8: See the response to interrogatory 7.

INTERROGATORY 9: Are you, your subsidiaries or affiliates presently in possession of any products used for thermal insulation which contains asbestos?

RESPONSE 9: No.

INTERROGATORY 10: If your answer to Interrogatory No. 9 is affirmative, then please state:

a. Itemize and list the type of such thermal insulation you presently have in your possession by the brand name or trade name of the insulation and the function of the insulation e.g., pipe covering, block, insulating cement, blankets, rope and the like.

b. State the present location of all such products.

c. State the name, address and position or title of employment of each such person who has custody of such products.

d. State the name, address, and position or title of employment of each such person supplying information or material used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any part of this Interrogatory.

e. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production, each and every document or written or printed matter or other tangible item which was read, examined, consulted, reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed matter or other tangible item.

RESPONSE 10: Not applicable.

INTERROGATORY 11: With regard to the asbestos component of any product listed in answer to Interrogatories 1, 2, 3, 4, 5, 6, 7, please state from whom you, your subsidiary, division or predecessor in interest obtained such asbestos and, if there is more than one source of asbestos for a particular product, please list all sources and, if the source varied from year to year, or from time to time, please state the source at the time or times it changed, and state the type of asbestos obtained from each source.

a. State the name, address and position or title of employment of each person supplying information or material used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any part of this Interrogatory.

b. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production, each and every document or written or printed matter or other tangible item which was read, examined, consulted, reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed matter or other tangible item.

RESPONSE 11: Respondent is informed and believes that its asbestos containing products contained chrysotile or amosite asbestos. Respondent is informed and believes that the principal source of chrysotile asbestos that it used was Canada. There were several producers of chrysotile asbestos and the company believes that it purchased from a number of these producers on open order. Records are not available to the respondent to show from whom such purchases were made. The respondent is informed and believes that its amosite asbestos was secured from the Cape Asbestos Company. Records are not now available to the respondent to show the amounts of material purchased from the Cape Asbestos Company. Records have been discovered which show that in 1969 the company purchased 500 short tons of amosite asbestos from the General Services Administration by contract dated June 20, 1960, and 1,282 bags of amosite asbestos from the General Services Administration by contract dated July 7, 1969.

a. The Union Asbestos & Rubber Company was incorporated under the laws of the State of Illinois on March 19, 1918. On April 17, 1963, the company's name was changed to Unarco Industries, Inc., a Delaware corporation incorporated in May of 1970, continues to exist at this time.

Between 1917 and 1979 the company sold and manufactured various asbestos containing products. During 1954 the company disposed of certain manufacturing facilities that had earlier been involved in the manufacture of asbestos containing products. In 1962, a large part of the company's business dealing with the manufacture of asbestos containing products was sold. By 1970 Unarco Industries, Inc., had sold the remainder of its business dealing with the manufacture of asbestos containing products. Unarco Industries, Inc. has not manufactured asbestos containing products of any kind since 1970.

When the company disposed of its various manufacturing facilities that had earlier been involved in the manufacture of asbestos containing products, it was the company's usual practice to leave most of its records at the particular facility. Similarly, employees at a transferred facility

generally were not retained in the company's employ. For these reasons and because of the passage of time since the company ceased its involvement in the manufacture of asbestos containing products, Unarco Industries, Inc., no longer has in its employ, to the best of its knowledge, information and belief, any person or persons who have the knowledge necessary to respond directly to this interrogatory. The company no longer has in its possession or at its disposal, to the best of its knowledge, information and belief, records or documents which it may consult to develop the requested information.

b. See the response to interrogatory 11 a.

INTERROGATORY 12: Does Defendant Johns-Manville Corporation agree that, by 1929, it knew that persons exposed to an adequate dose of asbestos could develop asbestosis?

a. State the name, address and position or title of employment of each person supplying information or material used in answering any part of this Interrogatory, or who was consulted with regard to information used in answering any part of this Interrogatory.

b. Please list and itemize with sufficient particularity so that it may be made the subject of a request for production, each and every document or written or printed matter or other tangible item which was read, examined consulted, reviewed or used in any way in obtaining information used in answering any part of this Interrogatory, and state who the custodian is of each such document or written or printed matter or other tangible item and the location of each such document or written or printed matter or other tangible item.

RESPONSE 12: Not applicable.

INTERROGATORY 13: Does Defendant agree that, by 1929, it or its predecessors in interest knew that persons who inhaled and retained in their lungs an adequate dose of asbestos could develop asbestosis?

RESPONSE 13: Objection, overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information. However, without waiving these objections, the Union Asbestos & Rubber Company was incorporated under the laws of the State of Illinois on March 19, 1918. On April 17, 1963, the company's name was changed to Unarco Industries, Inc., a Delaware corporation incorporated in May of 1970, continues to exist at this time.

Between 1918 and 1970 the company sold and manufactured various asbestos containing products. During 1954 the company disposed of certain manufacturing facilities that had earlier been involved in the manufacture of asbestos containing products.

In 1962 a large part of the company's business dealing with asbestos manufacture was sold. By 1970, Unarco Industries Inc., had sold the remainder of its business dealing with the manufacture of asbestos containing products. Unarco Industries Inc., has not manufactured asbestos products of any kind since 1970.

When the company disposed of its various manufacturing facilities that had earlier been involved in the manufacture of asbestos containing products, it was the company's usual practice to leave most of its records at the particular facility. Similarly, employees at a transferred facility generally were not retained in the company's employ. For these reasons and because of the passage of time since the company ceased its involvement in the manufacture of asbestos containing products, Unarco Industries, Inc., no longer has in its employ, to the best of its knowledge, information and belief, any person or persons who have the knowledge necessary to respond directly to this interrogatory. The company no longer has in its possession or at its disposal, to the best of its knowledge, information and belief, records or documents which it may consult to develop the requested information.

INTERROGATORY 14: If your answer to Interrogatory No. 13 is negative, when do you maintain you first became aware that persons who inhaled and retained in their lungs an adequate dose of asbestos could develop asbestosis.

RESPONSE 14: See response to Interrogatory 13 above.

INTERROGATORY 15: In 1930, did this Defendant or its subsidiaries or predecessors in interest own or operate facilities for the manufacture of asbestos-containing textile products?

RESPONSE 15: Yes.

INTERROGATORY 16: In 1930, did this defendant or its subsidiaries or divisions or predecessors in interest own or operate facilities where asbestos-containing thermal insulation products were manufactured (in addition to those facilities listed in answers to preceding Interrogatories)?

RESPONSE 16: Yes.

INTERROGATORY 17: In 1930, did this Defendant or its subsidiaries or divisions or predecessors in interest own or operate facilities where asbestos was mined and/or milled or have any interest in any such facility?

RESPONSE 17: No.

INTERROGATORY 18: At any time, did Metropolitan Life Insurance Company conduct or make industrial hygiene surveys or measurements at any facility or location where asbestos-containing products were manufactured, or asbestos was mined and milled, or where asbestos or asbestos-containing products were used by you or your division, subsidiaries or predecessors in interest?

RESPONSE 18: No.

INTERROGATORY 19: If your response to Interrogatory 18 is affirmative, then state the following:

a. Did you have any written agreements with Metropolitan Life Insurance Company for the conducting of any such surveys?

b. Please state the names of all facilities or all locations where any such survey was conducted.

c. State the date when each such survey was conducted.

d. State the names of all persons conducting such surveys and who have knowledge of such surveys and, if known, those persons' last known addresses.

e. Do you have in your possession, custody or control reports of data collected, or conclusions reached, as a result of any such surveys? If your answer to this sub-part (e) is affirmative, please state the location and the custodian of each such report.

RESPONSE 19: Not applicable.

INTERROGATORY 20: Did you at any time acquire an entity, part of an entity or the assets of an entity that manufactured products used for thermal insulation which contain asbestos?

RESPONSE 20: Yes.

INTERROGATORY 21: If your response to Interrogatory No. 20 is affirmative, then state:

a. When each such acquisition was made by you.

b. Exactly what you acquired in each acquisition, e.g., an entity, part of an entity, or the assets of an entity.

c. The name of each entity acquired or from whom you acquired a part of an entity or from whom you acquired assets.

d. Was any such acquisition the subject of a written agreement? If your response to this sub-part (d) is in the affirmative, please set forth verbatim the contents of each such agreement. In lieu of stating verbatim the content of each such agreement, you may attach copies of all such agreements to your answers to these Interrogatories.

RESPONSE 21:

- a. April 1, 1947.
- b. The entire capital stock.
- c. Carolina Asbestos Company.
- d. Respondent objects to this sub-part of this interrogatory on the basis that it is overly broad, uncertain, irrelevant and not calculated to lead to the discovery of evidence admissible in this matter.

INTERROGATORY 22: At any time, was any part of your stock, assets, or equity, or the stock, assets or equity of any of your predecessors in interest, owned in whole or in part by any other entity?

RESPONSE 22: No, at least with respect to any of its asbestos operations.

INTERROGATORY 23: If your answer to Interrogatory No. 22 is affirmative, please state:

- a. The name of each entity owning, in whole or in part any portion of your stock, or your predecessor in interest's stock, assets or equity.
- b. The dates of such ownership.
- c. The extent of such ownership (for example, owned 50% of common stock).
- d. Whether representatives of such owning entity were officers, directors or managing agents of your or your predecessors' corporation.

RESPONSE 23: Not applicable.

INTERROGATORY 24: Did you or your affiliates, divisions, subsidiaries or predecessors in interest, at any time, belong to any of the following organizations?

- a. Asbestos Textile Institute?
- b. Industrial Hygiene Foundation, later known as Industrial Health Foundation?
- c. Quebec Asbestos Mining Association?
- d. Quebec Asbestos Producers Association?
- e. National Insulation Manufacturers Association?
- f. Thermal Insulation Manufacturers Association?
- g. Asbestos Information Association, North America?
- h. National Insulation Contractors Association?
- i. Thermal Insulation Contractors Association?
- j. The Magnesite Association, the 85% Magnesite Association, or any organization with a similar name?
- k. American Standards Association?
- l. American Society for Testing and Materials
- m. American National Standards Institute or any of its predecessors?

RESPONSE 24:

a. Respondent is informed and believes that it was a member of the Asbestos Textile Institute from November 16, 1944, to December 8, 1955.

b. The respondent is informed and believes that it was a member of the Industrial Health Foundation from April 13, 1945, to April 17, 1950.

c. No.

d. No.

e. The respondent is informed and believes that it was a member of the National Insulation Manufacturers Association from December 17, 1958 to June of 1962.

f. No.

g. No.

h. No.

i. No.

j. No.

k-m Certainly not with respect to any asbestos matter or asbestos operations.

INTERROGATORY 25: If any of your responses to Interrogatory 24a-24m are affirmative, then state:

a. The dates you or your affiliates, divisions, subsidiaries or predecessors in interest belonged to each such organization.

b. The names of all persons who attended meetings of each such organization on your behalf or on behalf of your affiliates, subsidiaries, divisions, or predecessors in interest, and the dates they attended, and their positions or titles of employment at the time they attended such meetings.

RESPONSE 25:

a. See responses to Interrogatory 24 above.

b. No book, record or document received or prepared by the respondent with respect to its membership in these organizations, if the respondent ever had any such book, record or document, has been retained by the respondent in its normal course of business. The only information respondent has as to who, if anybody, attended meetings of these organizations is based upon review of the minutes and documents of such organizations. These minutes and documents have been produced by others and respondent has no other information or belief with respect to the veracity or accuracy of these documents.

INTERROGATORY 26: Do you have in your possession, custody or control minutes, records, proceedings or similar records or documents regarding meetings of the following organizations:

- a. Asbestos Textile Institute? If so, for what years?
- b. National Insulation Manufacturers Association? If so, for what years?
- c. Thermal Insulation Manufacturers Association? If so, for what years?
- d. The Magnesia Association, the 85% Magnesia Association or any organization with a similar name? If so, for what years?
- e. National Insulation Manufacturers Association? If so, for what years?
- f. Thermal Insulation Manufacturers Association? If so, for what years?

RESPONSE 26: See response to Interrogatory 25 above.

INTERROGATORY 27: If your answer to Interrogatory No. 26 is affirmative in any respect, then please attach copies of all such minutes, records proceedings or similar records or documents to your answers to these Interrogatories. If you refuse to attach such copies, please state in detail your reasons for such refusal.

RESPONSE 27: Not applicable.

INTERROGATORY 28: For the period that you manufactured sold or distributed products which contained asbestos that were used for thermal insulation purposes, state:

- a. The name and location of the entity from whom you obtained the asbestos used in such products and, if it varied from time to time, please state the supplier of your asbestos at each time.
- b. The type of asbestos obtained from each supplier at each time (e.g., amosite, crocidolite, chrysotile, anthophyllite).
- c. The manner in which the asbestos was packaged or contained when it reached the location where it was to be incorporated into another product or repackaged.
- d. The contents and/or description of any writing, marks, stamps, tags, designations or artwork appearing on the location where it was to be incorporated into some other product or to be repackaged and, if it changed from time to time, state what such changes consisted of.

RESPONSE 28: See response to Interrogatory 11 above.

INTERROGATORY 29: Did you at any time use the services of one or more person(s), laboratory, facility or other entity for the purpose, in whole or in part, of evaluating occupational disease claims made against you, or evaluating people for the presence of pulmonary or cardio-pulmonary chest disease?

RESPONSE 29: Objection, overly broad, vague, and neither relevant nor reasonably calculated to lead to the discovery of relevant information. Given the vagueness of the Interrogatory and its breadth, it appears that the Interrogatory also, when combined with Interrogatory 30, seeks privileged information.

INTERROGATORY 30: If your answer to Interrogatory No. 29 is affirmative, please state:

- a. The name and address of each such person, laboratory, facility or other entity.
- b. The dates such services were used.
- c. To whom in your organization such person, laboratory, facility or other entity reported, and, if the person in your organization changed from time to time, please state the person's name and position or title at each such time.

RESPONSE 30: See response to Interrogatory 29 above.

INTERROGATORY 31: Did you at any time use the services of one or more person(s), laboratory facility or other entity for the purpose of analyzing, evaluating or testing asbestos or asbestos-containing products to determine if that asbestos or these asbestos products were potential health hazards or were capable of producing adverse biological effects in persons or animals exposed to such asbestos products?

RESPONSE 31: Objection. Overly broad, vague, and neither relevant nor reasonably calculated to lead to the discovery of relevant information. Given the vagueness of the Interrogatory and its breadth, it appears that the Interrogatory also, when combined with Interrogatory 32, seeks privileged information.

INTERROGATORY 32: If your answer to Interrogatory No. 31 is affirmative, then state:

- a. The name or names of each such person, laboratory facility or other entity.
- b. The date or dates such services were used.
- c. The description of the asbestos or asbestos-containing products that were analyzed, evaluated or tested and the date or dates they were analyzed, evaluated or tested.
- d. The name, position or job title, and dates of employment of all persons employed by you who arranged for or requested such analysis, evaluation or testing, or were responsible for communicating with the person, laboratory, facility or other entity doing the analyzing, evaluating or testing.
- e. Whether you have in your possession, custody or control any reports, letters, memoranda, documents, photo-

graphs, slides, graphs, charts, diagrams, notes or other tangible items pertaining to any such analyzing, evaluating or testing. If your response to this sub-part (e) is affirmative, state:

1) A description of all such materials sufficient to make such materials the subject of a request for production or, in the alternative,

2) Attach copies of all such materials to your answers to these Interrogatories.

RESPONSE 32: See response to Interrogatory 31 above.

INTERROGATORY 33: State the name and last known address of all physicians employed by you, now or in the past, including where that physician was employed by you, the dates he was employed by you, and the general nature of the physician's duties while employed by you.

RESPONSE 33: Objection. Overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information.

INTERROGATORY 34: State the name and last known address of all physicians doing work for you on a contract basis, now or in the past, including where that physician was located when doing contract work for you, the dates he was doing contract work for you and the general nature of the physician's duties while doing contract work for you.

RESPONSE 34: Objection. Overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information.

INTERROGATORY 35: State the name and last known address of all physicians working for you and paid by you as consultants, now or in the past, including where that physician was located when doing consultation work for you, the dates he was doing consultation work for you and the general nature of the physician's duties while doing consultation work for you.

RESPONSE 35: Objection. Overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information. Additionally, the Interrogatory calls for privileged information.

INTERROGATORY 36: State the name and last known address of all industrial hygienists employed by you, now or in the past, including where that industrial hygienist was employed by you, and the nature of the industrial hygienist's duties while employed by you.

RESPONSE 36: Objection. Overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information.

INTERROGATORY 37: State the name and last known address of all industrial hygienists doing work for you on a contract basis, now or in the past, including where that industrial hygienist was located when doing contract work for you, the dates he was doing contract work for you and the general nature of the industrial hygienist's duties while doing contract work for you.

RESPONSE 37: Objection. Overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information. Additionally, the Interrogatory calls for privileged information.

INTERROGATORY 38: State the name and last known address of all industrial hygienists working for you and paid by you as consultants, now or in the past, including where that industrial hygienist was located when doing consultation work for you, the dates he was doing consultation work for you and the general nature of the industrial hygienist's duties while doing consultation work for you.

RESPONSE 38: Objection. Overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information. Additionally, the Interrogatory calls for privileged information.

INTERROGATORY 39: Do you claim that you at any time placed warnings, cautions or other advisements on any asbestos or asbestos-containing products as to potential health hazards associated with the use of such products?

RESPONSE 39: No label placed by the respondent on any of its products has been retained by it in the normal course of its business. However, respondent is informed and believes that a label containing the following language is a label which may have been placed on the respondent's products sometime in the late 1960's:

"CAUTION. This product contains asbestos fiber. Inhalation of asbestos in excessive quantities over long periods of time may be harmful. If dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirators approved by the U.S. Bureau of Mines for Pneumoconiosis producing dusts."

However, this defendant can not now verify that the above information is accurate or correct. Other than this information, respondent has no other knowledge, information, or belief with respect to the communication of a warning or caution by way of label with regard to any of its asbestos containing products. Discovery is continuing.

INTERROGATORY 40: If your answer to Interrogatory No. 39 is affirmative, please state:

- a. The exact wording of each such caution, warning or advisement.
- b. The exact date each such caution, warning or advisement was placed on the product itself, on the containers.
- c. Whether the caution, warning or advisement was placed on the product itself, on the container only or on both the product and container.

RESPONSE 40: See response to Interrogatory 39 above.

INTERROGATORY 41: Do you agree that the health hazards associated with exposure to asbestos and/or products used for thermal insulation which contain asbestos are asbestosis, lung cancer, pleural mesothelioma, peritoneal mesothelioma and gastrointestinal cancer?

RESPONSE 41: Respondent is informed and believes, based upon medical and scientific information available today, that asbestosis may be associated with the inhalation of asbestos in excessive quantities over long periods of time. Respondent is informed and believes, based upon medical and scientific information available today, that some physicians and scientists have associated excessive inhalation and ingestion of asbestos with lung cancer, mesothelioma, and gastrointestinal cancer. Respondent is informed and believes that even today there is a dispute in the medical and scientific communities concerning these associations.

INTERROGATORY 42: If your answer to Interrogatory No. 41 is negative in any respect, then please state in detail the reason for such negative response.

RESPONSE 42: See response to Interrogatory 41 above.

INTERROGATORY 43: Did you ever publish or sponsor, in whole or in part, any publication (such as a pamphlet, brochure, article, or the like) which described the potential health hazards associated with exposure to respirable asbestos, or which attempted to describe methods or procedures for handling asbestos or asbestos-containing products? If your response to this Interrogatory is affirmative, please describe with sufficient particularity to make it the

subject of a request for production each such publication or, alternatively, attach copies of all such publications to your answers to these Interrogatories.

RESPONSE 43: Objection. Overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information. However, respondent will state that it is informed and believes that it did not generally recommend methods of field handling for final installation of its products. The company did not advise users of the product as the products were sold to distributors and ultimately to contractors who were experts in the installation business. Copies of certain product literature pertaining to products manufactured by the respondent containing some information are available for inspection in the offices of counsel for the respondent upon reasonable notice. The copies are not good, and are not subject to being clearly copied. Respondent does not know whether or not it is complete or accurate as it was not in the respondent's possession before discovery. Respondent is informed and believes that Owens-Corning Fiberglas Corporation may have certain product literature that may have been used by the respondent. Respondent does not know whether or not this product literature is accurate or complete. The preceding items were not in the possession or under the control of the respondent and were not maintained by us in the normal course of its business. The respondent does not know the date of preparation of these items. The respondent is not able to verify the authenticity or accuracy of the brochures. Respondent is not able to authenticate the genuineness of the documents.

INTERROGATORY 44: Do you have in your possession custody or control any documents, letters, reports, memoranda, notes, correspondence or other tangible items regarding or in any way related to any survey, study, investigation or analysis of any segment, sector or portion of the asbestos industry in the United States which was conducted by the United States Public Health Service? (The term "asbestos industry" includes any facility or location where asbestos or asbestos-containing products were mined, milled, processed, fabricated, used.)

RESPONSE 44: No, except what may have been produced by others in this litigation.

INTERROGATORY 45: If your answer to Interrogatory No 44 is affirmative, then state:

- a. The name, address and position or title of employment of the custodian of all such documents, letters, reports, memoranda, notes, correspondence or other tangible items.
- b. The location by address, of all such items.

c. A description of each document, letter, report, memorandum, note, correspondence or other tangible item, including the date of such item, the number of pages of such item, the apparent author of such item, the recipient or addressee of such item (if any) and any other description adequate to make each such item the subject of a request for production.

d. In lieu of answering this Interrogatory No. 44, you may supply copies of all such items with your answers to these Interrogatories.

RESPONSE 45: See response to Interrogatory 44 above.

INTERROGATORY 46: Do you have in your possession, custody or control any records, lists, documents or other tangible items which contain any information about products used in any United States shipyard (whether operated or owned by the United States Government or not) between 1940 and 1946?

RESPONSE 46: No, except what may have been produced by others in this litigation.

INTERROGATORY 47: If your response to Interrogatory No. 46 is affirmative, then state:

a. The name, address and position or title of employment of the custodian of such items.

b. The location, by address, of such items.

c. A description of each such item sufficient to make it the subject of a request for production.

d. In lieu of answering this Interrogatory No. 46, please supply copies of all such items with your answers to these Interrogatories.

RESPONSE 47: See response to Interrogatory 46 above.

INTERROGATORY 48: Do you have in your possession, custody or control any records, documents, report, lists, compilations or other tangible items reflecting or containing any information concerning entities to whom you sold asbestos containing products used for thermal insulation?

RESPONSE 48: Objection. Overly broad and neither relevant nor reasonably calculated to lead to the discovery of relevant information.

INTERROGATORY 49: If your answer to Interrogatory No. 48 is affirmative, state:

a. Do such items reflect any date or dates on which such products were sold?

b. State the name, address and position or title of employment of the custodian of all such items.

c. Describe each such item, individually or by category, in such a manner as to identify all such items so that all such items may be made the subject of a request for production.

d. In lieu of answering this Interrogatory No. 48, please attach copies of all such items to your answer to these Interrogatories.

RESPONSE 49: See response to Interrogatory 48 above.

INTERROGATORY 50: Do you have any evidence or information as to whether or not there ever was in the State of Colorado any facility, the purpose or function of which was to mine asbestos, mill asbestos or manufacture products incorporating asbestos as an ingredient? If so, please state all evidence or information you have in this regard.

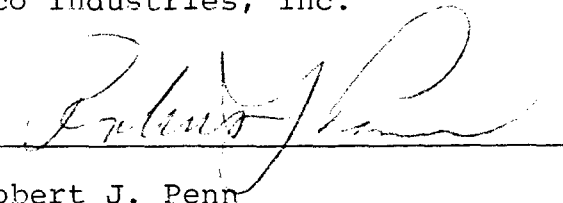
RESPONSE 50: Respondent never had such a facility. Respondent does not know if others may have had such a facility.

State of Illinois)
) ss
County of Cook)

Robert J. Penn, being first duly sworn according to the law, states that the information set forth herein, based upon his information and belief, is true and accurate.

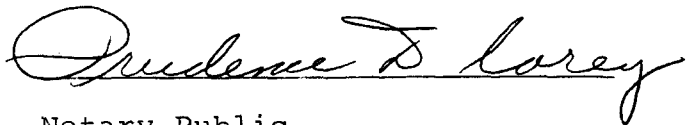
Unarco Industries, Inc.

By



Robert J. Penn

Sworn and subscribed before me this 22nd day of JANUARY, 1982.



Notary Public

MY COMMISSION EXPIRES June 8, 1983

CERTIFICATE OF MAILING

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Suite 200
Denver, Colorado 80206

J. Conard Metcalf, Esq.
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Boulder, Colorado 80203

I hereby certify that on this 1st day of February, 1982, I deposited in the United States mail, postage prepaid, a true and correct copy of the foregoing DEFENDANT UNARCO'S RESPONSES TO PLAINTIFFS' FIRST SET OF INTERROGATORIES TO ALL DEFENDANTS EXCEPT METROPOLITAN LIFE to the above listed individuals.

Cindy Beltzer

EXHIBIT ONE

The following is a list of those products known to have been manufactured and sold by Union Asbestos & Rubber Company and Unarco Industries, Inc. It is possible that brochures and pamphlets or other material not available at this time may contain information as to other products or other information as to the listed products. The list provided below may be subject to some later additions should further information be discovered or made available.

(1) Unibestos - sectional pipe insulation:

This product was first manufactured in 1936. It was manufactured at the Cicero, Illinois, plant; the Paterson, New Jersey plant; the McGregor, Texas, plant; the Tyler, Texas, plant and the Bloomington, Illinois, plant at various times. This was a molded sectional pipe insulation made in numerous sizes and brown in color. It was manufactured from amosite asbestos fibers. Added to these fibers was diatomaceous earth and a bonding agent of sodium silicate was sprayed on the mix of amosite and diatomaceous earth.

(2) Unibestos - insulation blocks:

It is not known when this product was first manufactured. It is believed that this product was manufactured at the Paterson, New Jersey, plant; however, it is not known when production of this

product ceased. It is known, however, that the entire Unibestos line was sold on July 1, 1962.

(3) Insubestos - insulating felt:

It is believed that this product was developed in the early 1940's. It consisted of rovings of amosite woven together by use of asbestos yarn into a felt blanket.

(4) Asbestos textiles were manufactured from chrysotile asbestos fiber and cotton twisted into a yarn and then woven into cloth, tapes, tubings, sleeveings, cord, etc. These products were manufactured at the Davidson and Marshville, North Carolina, plants.

(5) Insutape and Super Insutape:

This was a wrap-on insulation - a woven asbestos tubing through which a roving of amosite, overlacing with asbestos yarn, was drawn. Some was treated with a neoprene coating for weatherproofing.

(6) Wovenstone:

This was a lace on insulation made from amosite rovings laced with asbestos yarn and made into a narrow felt.

(7) Insutube - a slip-on insulation:

This was a double-braided, neoprene-treated asbestos tubing used for small hot and cold water pipes.

(8) Braided asbestos packings:

Asbestos yarns braided into squares, twisted or plain. This was treated with neoprene and other coatings. It was made at Marshville and shipped to Bloomington for treatment.

(9) Asbestos Cloth.

(10) Asbestos rope.

(11) Unibestos sheets.

(12) High pressure packing.

(13) Asbestos gaskets.

All of the above were manufactured prior to 1948.

The Unibestos line was sold on July 1, 1962. Many of the above lines were also discontinued in the 1960's. For example, all asbestos textile manufacturing operations ceased in 1963, with the sale of the Marshville plant.

(14) Fibrous glass insulating and acoustical products.
these were apparently added in 1948.

(15) Custom tailored high temperature insulation for diesel locomotive, turbines and other industrial uses. It is assumed that such products were also made prior to 1948.

(16) Unarco Metal Mesh Insulating Blankets (1949)

(17) Unarco Fibrous Glass Insulating and Sound Blankets (1949).

(18) Unarco Thermal Insulating and Sound Blankets (1949).

- (19) Unarco Combination Asbestos - Glass Cloths (1949).
- (20) Asbestos cord.
- (21) Asbestos seals.
- (22) Unarco calcium silicate pipe insulation (1957).
- (23) Unarco calcium silicate insulating blocks (1957).
- (24) Unarco mineral wool (1957).
- (25) Unarco insulating cements (1957).
- (26) Unarco asphalt waterproofing materials (1957).

It is believed that items 22-26 were no longer manufactured after 1960.

- (27) This product was first manufactured in 1959 or 1960. Rights to this product were acquired in 1958. It is not known from whom these rights were acquired. Unarcoboard is described as an inorganic noncombustible board.

- (28) Brake linings:

The company is informed and believes that it sold fabrics and yarns for manufacturers of brake linings during the 1920s. In or before February 1942 the respondent sold its brake lining division, stocks of work in process and inventories to L. J. Miley Company. The company has no other knowledge or information with respect to its manufacture or sale of brake lining.

EXHIBIT TWO

The company is presently engaged primarily in the manufacture and sale of welded steel tubing; materials handling equipment, including storage racks; shopping carts, and supermarket storage and display equipment, stainless steel sinks and plumbing fixtures; load restraining equipment, hand brakes and other equipment, largely for sale to railroads; safety lights for mobil homes and recreational vehicles; and molded rubber wheels. Within this framework, the products of Unarco Industries, Inc. are highly diversified and have been classified into three product groups - (1) steel fabricating, (2) food handling and commercial products, and (3) communication and transportation.

Plants

The Unarco Industries, Inc. - Union Asbestos & Rubber Company plants discussed below relate only to the former asbestos operations of the company. The company has and has had numerous other plants which are unrelated to the manufacture of asbestos products.

Cicero, Illinois

This plant was built in 1926. Its address was 1811-33 South 54th Avenue, Cicero, Illinois. The company manufactured numerous asbestos products at this plant including: insulation,

yarns, Unibestos pipe insulation and high temperature insulation for diesel engines. Plant operations ceased in 1953 and by 1954 all operations had been moved to the Bloomington, Illinois, plant.

Earlville, Illinois

On August 7, 1946, the company acquired this plant from the War Assets Administration. The plant manufactured asbestos gaskets and packings. Full scale operations were begun in 1947. In 1953, operations at this plant ceased and the plant was sold. Operations were moved to the Bloomington, Illinois, plant. The purchaser of the plant is unknown at this time.

Davidson, North Carolina

On April 1, 1947, the company acquired the entire capital stock of the Carolina Asbestos Company. The Carolina Asbestos Corporation manufactured asbestos textiles at the Davidson, North Carolina, plant and at a plant located at Marshville, North Carolina (see below). The plant was sold on April 14, 1950.

Marshville, North Carolina

See discussion of Davidson, North Carolina, plant above. This plant was also acquired on April 1, 1947. After the sale of the Davidson plant, the Marshville plant became the company's center for manufacture of asbestos textiles including cloths, tapes, tubings, yarns, etc. This plant was sold to Johns-Manville Corporation on March 6, 1963.

Bloomington, Illinois

This plant was first leased on January 1, 1951. At one time or another nearly all of the company's asbestos products were manufactured here. These products included: Unibestos pipe insulation, Unibestos insulating blocks, Wovenstone, Insutape, Insutube, Insubestos, etc. In 1953 the company's operations at Cicero, Illinois, and Paterson, New Jersey, were moved here. Those plants were closed. After sale of the Tyler, Texas, plant in 1962 and the Marshville, North Carolina, plant in 1963, the Bloomington plant was the only company facility where asbestos products were manufactured. In April, 1970, this plant was sold to Owens-Corning Fiberglas Corporation. The company, at that time or perhaps some months prior thereto, ceased all asbestos operations.

McGregor, Texas

In 1949 the company contracted with the War Assets Administration for purchase of the plant in McGregor, Texas. The sale was consummated in February, 1949. Production, however, did not begin until late 1949 or early 1950. This plant was engaged in the manufacture of Unibestos pipe covering. In 1953 the United States Government notified the company of its intent to acquire the plant by purchase. In 1954 the Government instituted condemnation proceedings for the plant.

Tyler, Texas

As a result of the notification given by the United States of its intent to purchase the McGregor plant, the company found another plant facility for the manufacture of Unibestos pipe covering. It purchased the Tyler, Texas, plant in 1954 and after several months of remodeling, it began operations there to manufacture Unibestos pipe covering. On July 1, 1962, the company sold this plant, together with all rights to the Unibestos insulation line to Pittsburgh Corning Corporation. At this time, production of the Unibestos line of asbestos ceased at the Bloomington, Illinois, plant.

Watseka, Illinois

The company is informed and believes that it had a facility for the manufacture of molded brake linings and clutch casings at Watseka, Illinois, for several years prior to approximately 1934 or 1935. At this time, the company has no other information with respect to this facility.

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO

Case No. 81-CV-0520-2

DEFENDANT UNARCO'S RESPONSES TO PLAINTIFFS' FIRST SET OF INTERROGATORIES TO ALL DEFENDANTS EXCEPT DEFENDANT METROPOLITAN LIFE INSURANCE COMPANY (March 18, 1981).

BILLIE JOE SWAN AND JO ANN SWAN, husband and wife,

Plaintiffs,

v.

JOHNS-MANVILLE SALES CORPORATION (successor by merger to
JOHNS-MANVILLE PRODUCTS CORPORATION, et al.,

Defendants.

COMES NOW defendant Unarco Industries, Inc., by and through its attorneys, Weller, Friedrich, Hickisch & Hazlitt, and in response to Plaintiff's First Set of Interrogatories to All Defendants, Except Metropolitan Life Insurance Company, (March 18, 1981), incorporates as though fully set forth herein its Responses to Plaintiffs' First Set of Interrogatories to All Defendants Except Metropolitan Life in 80-CV-1577-2D filed February 1, 1982.

WELLER, FRIEDRICH, HICKISCH &
HAZLITT

By


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Denver, Colorado 80264

Cindy Beltzer

3/4/82

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO

IN RE ASBESTOS CASES

REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT
UNARCO INDUSTRIES, INC.

JOHNSON - Case no. 80-CV-0942-2	)	IN RE ASBESTOS CASE
KRIEGER - Case No. 79-CV-1774-2	)	NO. 79-CV-1774-2D
PANTHER - Case No. 79-CV-0559-2	)	
AMON - Case No. 80-CV-2138-2	)	IN RE ASBESTOS CASE
DANIEL - Case No. 80-CV-1577-2	)	NO. 80-CV-1577-2D
CHASE	)	CASE NO. 81-CV-1741-2
JACKSON	)	CASE NO. 81-CV-1339-2
KELLOGG	)	CASE NO. 82-CV-0154-3
SWAN	)	CASE NO. 81-CV-0520-2

Plaintiffs,

v.

JOHNS-MANVILLE SALES CORPORATION (successor by merger to
JOHNS-MANVILLE PRODUCTS CORPORATION), et al.,

Defendants.

TO: DEFENDANT UNARCO INDUSTRIES, INC.

DATES, TIMES AND PLACES OF PRODUCTION:

1. DATE: SATURDAY - MARCH 6, 1982
TIME: (arrival time to be determined)
PLACE: WESTERVELDT, JOHNSON, NICOL & KELLER
1400 FIRST NATIONAL BANK BUILDING
PEORIA, ILLINOIS
2. DATE: MONDAY - MARCH 8, 1982
TIME: 8:00 a.m.
PLACE: UNARCO, INC.
332 S. MICHIGAN AVENUE
CHICAGO, ILLINOIS

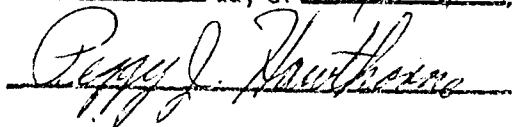
PRODUCTION OF DOCUMENTS (ORIGINALS OR LEGIBLE COPIES WHICH ARE TRUE AND CORRECT COPIES OF THE ORIGINALS) AT THE ABOVE STATED TIMES, DATES AND PLACES:

All documents pertaining to asbestos-related disease; asbestos-related disease claims; asbestos-related disease research, sales and purchase and manufacture of asbestos and asbestos-containing products in your possession, custody and control.

WILLIAMS, TRINE, GREENSTEIN
& GRIFFITH, P.C.


J. Conard Metcalf, #2489
Attorneys for Plaintiffs
1435 Arapahoe Avenue
Boulder, CO 80302
(303) 442-0173

was hand delivered to
Marc R. Brosseau, Esq. on 3-5-82 &
A true copy hereof was mailed to all opposing counsel of
record at their office (s) address by depositing the
same in the U.S. Mail at Boulder, Colorado, first class,
postage prepaid, this 4th day of March,
19 82



4/13/82

DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO

IN RE ASBESTOS CASES

REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT
UNARCO INDUSTRIES, INC.

✓ JOHNSON	- Case No. 80-CV-0942-2	)	
✓ KRIEGER	- Case No. 79-CV-1774-2	)	
✓ PACELLO	- Case No. 80-CV-0089-2	)	IN RE ASBESTOS CASE
✓ PANTHER	- Case No. 79-CV-0559-2	)	NO. 79-CV-1774-2D
WOLFE	- Case No. 80-CV-0935-2	)	
✓ AMON	- Case No. 80-CV-2138-2	)	
✓ DANIEL	- Case No. 80-CV-1577-2	)	IN RE ASBESTOS CASE
✓ LARSON	- Case No. 80-CV-1714-2	)	NO. 80-CV-1577-2D
✓ BOLTON			CASE NO. 81-CV-1296-2
✓ CHASE			CASE NO. 81-CV-1741-2
✓ CULP			CASE NO. 82-CV-0067-2
✓ GOOLD			CASE NO. 81-CV-0541-2
✓ JACKSON			CASE NO. 81-CV-1339-2
✓ KELLER			CASE NO. 82-CV-0403-2
✓ KELLOGG			CASE NO. 82-CV-0154-3
✓ SWAN			CASE NO. 81-CV-0520-2

Plaintiffs,

v.

JOHNS-MANVILLE SALES CORPORATION (successor by merger to
JOHNS-MANVILLE PRODUCTS CORPORATION), et al.

Defendants.

TO: DEFENDANT UNARCO INDUSTRIES, INC.

DATE, TIME AND PLACE OF PRODUCTION:

DATE: MONDAY - MAY 3, 1982
TIME: 9:00 a.m.
PLACE: UNARCO OFFICES
332 S. MICHIGAN AVENUE
CHICAGO, ILLINOIS

PRODUCTION OF DOCUMENTS (ORIGINALS OR LEGIBLE COPIES WHICH ARE TRUE AND CORRECT COPIES OF THE ORIGINALS) AT THE ABOVE STATED DATE, TIME AND PLACE:

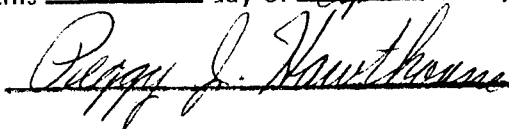
A. Any and all documents or any other tangible item regarding health hazards of asbestos or asbestos-containing products; claims against UNARCO or Union Asbestos & Rubber Company by those alleging asbestos related disease, which claims predate 1970; purchases and sales by UNARCO or Union Asbestos & Rubber Company; purchases and sales of asbestos-containing products by UNARCO or Union Asbestos & Rubber Company; regarding research (in any way sponsored, funded or supported by UNARCO or Union Asbestos & Rubber Company) concerning asbestos related health hazards; the attending of meetings or conferences by employees or representatives of Union Asbestos & Rubber Company or UNARCO where asbestos related health hazards were discussed (including agendas, programs, texts of speeches given, notes made, travel arrangements, hotel accommodations and the like).

B. To the extent not included in (A) hereof, any and all other documents or tangible items produced by UNARCO or Union Asbestos & Rubber Company, in any other litigation relating to asbestos related disease.

WILLIAMS, TRINE, GREENSTEIN
& GRIFFITH, P.C.


J. Conrad Metcalf, #2489
Attorneys for Plaintiffs
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Boulder, CO 80302
(303) 442-0173

A true copy hereof was mailed to all opposing counsel of record at their office (s) address by depositing the same in the U.S. Mail at Boulder, Colorado, first class, postage prepaid, this 13th day of April, 19 82



May 3 1982

UNPREC DOC PRODUCTION
332 Smith Ave
Chicago Ill
(Illinois Headquarters)

ACCOUNTS RECEIVABLE LEDGER

P1

MAY 3 1952

UNARCO DOC INSPECTION
332 S. MICH AVE

ACCOUNT	dates	# of CARDS
UNION PACIFIC RR CO 1416 DODGE ST OMAHA NEB 66102	12-15-72 8-17-65 THOUSANDS OF DOLLARS first sheet is No 67	18
UNION TANK CAR CO 111 W. Jackson Chicago. 60601	9-20-62 → 10-16-69 (UNARCO Industries Inc formerly UNION ACB & RUBBER CO).	1
United Hardware Dist Co 2432 N. Second St Minneapolis 55411	10-14-64 → 12/13/67	1
United States Steel Co 208 S La Salle ST Chicago, Ill	8/8/62 - 7/25/66 first sheet = #9.	1
The Tappan Co 250 Wayne St Mansfield Ohio	7-14/65 - 1/20/66 (sheet No 5 is first)	1
Taylor Insulation Co Merrill Wis	8/21/69	1
VP Supply Corp 67 Warehouse St Rochester NY 14608	9/18/64 - 2/13/67 - 1/27/70 sheet No 1 - first	
Valley Forge Conveyor 401 E Lafayette St P.O. Box 822 Harrisburg Pa 17104	9/7/65 - 1/31/67	#2

Vermont Electric Supply Co Inc 9/29/64-5/9/67
50 Center St
Rutland VT

1

Viking Pump Co
Okauch Falls Iowa 50613 6/22/64-4/25/67

1
(Sheet No 12)

Terragroup Inc
82 Beaver St 4/7/66-1/23/68
New York New York 10005

2
(Sheet No 13)

Florence Plumbing Supply Co 1/31/66-2/22/66
2033 E Florence Ave
Los Angeles CA 90001

1

T. J. Fleming Co
647 Southwest Blvd
Kansas City, Kansas 66103

2/28/73-
4/27/73

1

Planagan Supply Co
829 SW 4th St
Oklahoma City, Okla 73125

3/17/66-
6-17-68

1

J. George Fischer & Sons Inc
2115 Rust Ave
Saginaw, Mich 48605

3/31/54-
4/29/69

1

Fish and Hunter Co
94 Sherman St
Leadwood S. D.

3/15/67-
8/8-69

1

Fitting Supply Co
1306 S. 18th St
Waco, Tex 76706

2/10/66-
4/20/70

1

Jams. Hewille
Merchandise Mart
Chicago Ill

1/10/66-
4/21/70

5
(No 13-22)

F & M Manufacturing
1834 Horn St
Sharpsburg Pa 15215

11/22/65 -
1/22/69

1

Cummings & Co
Route 2 U.S. 41 North
Kurfreesboro, Tenn

11/28/69

1

Continental Custom Floors
1422 Dunport Blvd
Wilmington Manor
New Castle Del 19720

12/18/64
~~2/13/65~~ -
11/28/69

1

Adolph Coors
Golden, CO

5/18/65 -
9-18-72

1

Gretna Kitchens Inc
8480 Fenton Pl.
Silver Springs Md 20910

9/28/64 -
7/27/70

1

Bronco Enterprise Corp
19 Song Chang Rd
Taipei, Taiwan

5/31/73

1

Consolidated Electrical Distributors
P.O. Box 4938
Santa Fe, N. Mex 87501

9/10/65 -
2/4/70

1

Colorado and So Ry Co
P.O. Box 5144 (618 Johnson Bldg)
Denver Co 80217

11/15/66 -
3/7/72

1

Colossus - Midland Belting & Supply Co
P.O. Box 7037
Shreveport, La 71107

6/12/66 -
3/30/70

1

Columbia Asbestos Co
111 S. W. Front Ave
Portland, OR. 97204

1/24/67-
3/20/70

1
(Sh No 9)

Ame Methane Products, Inc
681 Market St
San Francisco, CA 94105

12/31/68-
3/31/70

1

D. H. Kelly Co
70 Third St
Derby Conn 06418

1/24/65-
5/10/68

1

K. J. Kelly Ltd
68 Higgins Rd
Winnipeg 2, Manitoba
Canada

6/23/65 -
7/20/66

1

^{Electrical}
Kennewick Industrial Supply Co
113 East Ave "C"
Kennewick, Wash 99336

10/6/69

1

Kentucky and Indiana Terminal RR Co
34th and Garfield Sts
Louisville, Ky 40212

10/30/70
~~12/18/72~~
7/20/73

1
(Sh No 5)

East Farm Top Co
4233 Howard Ave
Kensington, Md.

10/6/65 -
3/31/66

1

Fenn Plumbing & Heating
1330 Ohio Ave
Dunbar, W. Va

3/27/67 -

1

Falkenstein Corp
Rear 3705 Benning Rd NE
Washington DC 20019

2/12/65 -
8/31/67

1

Young Insul Co
P.O. Box 5088
Amarillo Tex

3/8/62 -
5/29/69

Mesa F. Berglas Products Co 8/31/67
6451 E 49th Ave
Commerce City, CO 80022

Denver and Rio Grande Western Ry 6/16/72 -
P.O. Box 5482 7/31/73
Denver, CO 80217 (THOUSANDS OF DOLLARS)

(NO 9)

Timpte, Inc
5990 N. Washington
Denver CO 80216

8/29/66
~~4/14/69~~
6/27/69
THOUSANDS OF DOLLARS

Western Insul Co
P.O. Box 1089
Odessa Tex

12/12/62 -
7/5/69

Todd Shipyards Corp
Galveston Tex Div
P.O. Box 1550
Galveston Tex 77550

4/12/60
12/31/68

JT Thayer Co
P.O. Box 33389
Houston Tex 77033

5/31/66 -
2/27/70

Western Builders Supply
3241 Kentucky SE
Albuquerque NM

4/10/68 -

Western Builders Supply P.O. Box 1243 Billings, Montana	7/30/64 12/15/69	1
Western Fibrous Glass Products 739 Bryant St San Francisco 7, Calif.	2/8/63 - 1/12/67	2 (Sh No 25)
Western Pacific R.R. Co 826 Mission St San Francisco CA 94105	3/10/65 - 7/31/73 THOUSANDS \$	6 (Sh No 3)
Western Plumbing Supply 324 Kentucky SE Albuquerque, N. Mex	9/18/64 - 12/17/68	1
Webster Supply Co P.O. Box 212 Searcy, Ark. 72143	7/15/70	1
Wet, Inc 1401 Arcade Bldg St Louis, MO	2/6/69 - 1/31/72	1
Pleasant Distributors 204 Webb St Wilmington, Del.	9/24/64 - "/30/67	1
Pleasantville Plumbing Supply Co 18 N. Franklin Pleasantville N.J. 08232	9/20/64 12/19/68	1
Pullman Standard Car Mfg Co 5th Ave & 24th St Bessemer, Ala 35020	8/22/63 - 5/28/70	5 (19)

J. B. White & Sons, Inc P.O. Box 166 Merona Va	6/23/64 4/11/66	1
Cynaco Inc 9425 SW 73rd Ave Miami Fla	9/30/68 - 2/26/70	1
Calomcho Supply Co 710 S. Lucile Seattle, Wash 98108	11/30/65 - 7/14/69	1
Columbus & Greenville R.R. Co P.O. Box 706 Columbus, Miss 39701	7/25/52 6/30/72	1
Connet Corp North 3808 Seaburn Rd Spokane, Wash 99216	9/16/68 - 2/5/70	1 SH 1003
Barkley B. Bros Supply Co Old Meeting Rd Charleston Heights, S. C.	10/20/64 8/13/68	1
Baldwin Ebert Hill 500 Breunig Ave Dallry Forge Pa	8/18/58 - 1-30-67	1
Fox & Co Inc 67 Massachusetts Ave East Providence, RI	2/15/68	1
Fraser Bortles Service 101 E SW. Spokane St Seattle Wash	12/13/65 - 2/17/66	1
St. Ange Hardware & Supply Co 1724 Leavenworth Ave Oranget Mass 01826	9/24/64	

R & L Plumbing Supply Co 8 W. Broadway Beverly, New Hampshire	10/9/64 3/22/68 2/20/69	1
A. A. Ramsey & Son Inc P.O. Box 1249 Shelby N. Car	11/30/65 - 6/27/66	.
Lockhead Aircraft Corp Hamletta. S A	10/12/59 - 3/13/70	1
Columbia Caskets Corp 106 S.W. Front Ave Port land, OR	12/26/62 - 12/30/66	1 (207)
Grand Teton Lodge & Co Jackson Lake Lodge Jackson, Wyo	8/14/64 - 2/28/67	1
Sam Fox Stationers Steel Corp 4200 Kearney ST Denver Co 80216	3/30/64 - 8/7/67	1
Plant Caskets Co 1300 64th St Emeryville, CA	2/12/58 - 2 2/27/70	1 (No-7)
Warner Co 3625 East 48th Denver CO	10/29/64 - 6/10/66	1
Murdgony Ward & Co 618 W. Chicago Ave Chicago Ill All Branches	1/12/56 - 12/30/66	1 SH Nbrs

Union Pac RR Co 1416 Dodge St Omaha Neb	12/15/72 3/23/73	1 103
Ogden Nykter Stockholm Sweden	12/15/65 9/27/66	1
Elm Distributors 1225 Wazee Market Denver Co 80204	12/29/64 - 8/12/70	1
Western Casket Co 675 Townsend ST San Francisco CA	3/10/55 3/28/66	1
Eagle Picher Industries Inc American Bldg Ann Arbor, MI	10/22/59 - 6/23/69	1 No 3
Armstrong Outfitters & Supply 120 N. Lime St Lancaster, Pa	4/4/65 11/31/69	6 No 45
E. J. Bartels 1212 Sixth Ave Seattle, Wash	8/31/61 - 3/22/67	1 No 7
E & B Engineering & Supply P.O. Box 2531 Houston, Tex	1/14/60 - 5/11/66	1 No 3
Fuller Austin Insul Co P.O. Box 36305 Houston Tex	3/28/56 - 1/14/70	1
Commercial Adolfo S Pagan Inc PO Box 3452 San Juan PR	2/26/65 8/28/68	1

Pay & Pack Electric & Plumbing Supply Co 710 Orchard St Boise Idaho	2/13/68 7/17/70	1
Green Bros Fabrication & Inc 4420 1st Ave Golden, Colo 80401	6/5/64- 4/28/67	1
Ure-Glass Insulation Supply Co 51 Wazee Market Denver CO 80204	9/30/69- 2/12/70	1
Insulation Services Inc P.O. Box 7726 (4625) Tulsa Okla 74105	9/14/65- 1/29/71	2 No 35

5-3-82

6.) Documents re, purchases from Joshua-Manville Sales Corp. Principally yarns, cloth & pipe insulation - 1969.

No 9 280

date issued 2-3-70

"try improving your packaging"

J. Harmon, Cont - 2-3-70

2-17-70 Reply from Caroline Voorhees about plying

Minutes - Fibrous Products Committee
Black Notebook 3-ring binder

chart - Size - Frequency Dist. Kaylo Dust.
Fig 2.

9-26-49

4/17/50

order O-I Kaylo study material

O-I industrial hygiene survey -

56 Personnel files - Patterson N.Y. (selected for copying)

Thomas Tuohy - 11-24-48

James Wand - 1-18-51

John Van Tol - 4-13-50 (contents)

Harry Tonking - 12-13-49

Naum Tshlenka - 5-27-52

Unarco Industries Inc, Bloomington, List
of fixed assets.

Dept 01 - Insulation - Packing - Felt

Dept 02 - Packing

Dept 04 - Compound

05 - Plastic.

Unarco Industries Inc, Chembest Division
Packing (02), Insulation (01) and
Felt (03) Equipment Description

Interview Report OI - Baranac Kaylo Study
correspondence

Fibreboard To: M.S. Mary Leslie, ~~on~~ 5-2-60,

from R. S. Mitchell re OCF agreement

for mfg & sale of general Brand Kaylo
insul products.

3-1-60 Carey J. Fibreboard (VP) to OCF.
(4 pp) + 2 exhib. ts. A - 1 pg B - 22 pgs.
C - 3 pgs

Rethco Industrial Insulations Div of Fibreboard
Paper Products Corp.

Memo 3-17-67 Canible to others re: caution
for Caltemp and Kaylo.

O-I sold Kaylo to OCF on 4/30/58. O-I did not mfg or
sell thereafter, & OCF mfged from 4-30-58 → 1972

OCF was the major distributor of Kaylo 1953 - 1958.

Unarco Advertising, Sales and Promotional
Literature, brochures, etc

00-

James Bennett

Anton Beauchamp

Jim Sumey

Louis Novak.

Joseph E. Leech

William Thiel

Folder Labeled "Comp files"

- Henry Cahill c1940
- Tom Leslie Sylvester c1960
- Mike Steve c1944
- Samuel Beramuel c1943
- Ozzie L Wright c1945
- John Joseph Peters c1945
- Michael Zima c1946
- Joseph O Ryba c1956
- Catherine McGibbon c1947
- Frank Patkunas, c1955

- Anna Katusic

File - "Charleston 6/8/87"

- Nicholas Cotsakos c 1956

* - Pearl ^{Lee} Danheuser c 1960

- Joseph Rignatelli c 1956

- Tony Palanchuk c 1950

- Mary D Cannes. c 1951

- Kenneth Heacock c 1951

- William A Keelin c 1950

- Libby Friedman c 1953

- William P Hornak c 1948

* Charles ~~Danheuser~~
Danheuser c 1959

Harry Hall - c 1950

OD Files

Andrew Onorato c 1962
Edward Jacob Line c 1946
Antonia J Simmons c 1947
Henry Findley c 1947
Edouard P Kern c 1946
Irene L. Szczesniak c 1952
Herbert Owens c 1941
Charles Fairbanks c 1942
Joseph Bernas c 1939
note 2 Cowan MD letters - one for
public consumption, one confidential.
(6-8-39)

~~Frank~~
~~Frank~~ Brescia / Mik Gotsakas 9-8-50.

UNAPLO LIT 10-25-48 to Cryor from Shuman. p 2

10-16-48 Cowan to Cryor.

10-25-48 Cryor to Shuman p 1

Baldi to Cryor series re Patterson best cases 9-29-50
1-3-52
1-15-52 (3 pp)
10-2-44

Edward Best correspondence, notes, memos c 1944

Harold J Rushford Correspondence, pleading etc.

- Frank Breier S.L.

- file - Occupational Disease, Case Histories
L to Z

- Matt Lesko

- Lottie Gorski

- Edward Novak

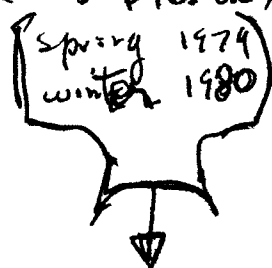
- Sam Ferst

- Peter Prusienky -

- Howard E King

- John Helcarz -

Runners found O.D. files on several diff occasions



storage room back office -

back storage vaulty

Saranac Lab File

- 1) Dissolution Saranac Laboratory 1961
(Transfer of assets)
- 2) Memo of Agreement 11-20-36
(Saranac Gardner Study)
- 3) O-I-Vorwald correspondence re
Wayto Studies.