

FILE NAME: Mannington Mills (MM)

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DOCUMENT DESCRIPTION: Legal - Defendant Tarkett, Inc.'s Responses to Plaintiff's Standard Interrogatories to All Defendants

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WARTNICK LAW - DM

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN FRANCISCO

10
11 IN RE) Case No. 828684
12 COMPLEX ASBESTOS LITIGATION)
13) DEFENDANT TARKETT, INC.'S
14) RESPONSES TO PLAINTIFFS' STANDARD
INTERROGATORIES TO ALL
DEFENDANTS PURSUANT TO GENERAL
ORDER 129

15 PROPOUNDING PARTY: PLAINTIFFS

16 RESPONDING PARTY: DEFENDANT TARKETT, INC.

17 SET NO.: ONE

18 Defendant sued herein as TARKETT, INC. ("Tarkett") responds to Plaintiff's

19 Interrogatories as follows:

20 **RESPONSES TO INTERROGATORIES**

21 **INTERROGATORY NO. 1:**

22 IDENTIFY the person verifying these answers on YOUR behalf.

23 **RESPONSE TO INTERROGATORY NO. 1:**

24 Alan J. Husak.

25 **INTERROGATORY NO. 2:**

26 State the date of first employment with YOU, and the dates and titles of each job position
27 person verifying these interrogatories has held while employed by YOU.
28

1 site in the GEOGRAPHIC AREA and whether any of THIS DEFENDANT's RAW ASBESTOS
2 has at any time, been sold to any manufacturer, or manufacturing facility, of ASBESTOS-
3 CONTAINING PRODUCTS. If so, state:
4 1. The names of each such COMPANY, governmental agency or
5 entity, shipyard, distributor, supplier, manufacturer or refinery;
6 2. The inclusive dates of each such sale, and the amount (quantity)
7 and the trade brand name of such RAW ASBESTOS sold;
8 3. The manner of shipment (e.g. boat, rail, etc.)
9 4. Whether you have any records indicating any such sale or shipment
10 and, if so, the name, address and job classification of each person who currently has possession
11 of such records.
12 5. Either (1) attach all DOCUMENTS evidencing the information
13 sought in this Interrogatory and its subparts to your answers to these Interrogatories, or (2) attach
14 disks containing such data, or (3) describe such DOCUMENTS with sufficient particularity that
15 they may be made the subject of a request for production of documents.

16 **RESPONSE TO INTERROGATORY NO. 29:**

17 Not applicable.

18 **INTERROGATORY NO. 30:**

19 Between 1930 and 1985, did YOU ever engage in any of the activities listed below with
20 regard to ASBESTOS-CONTAINING PRODUCTS? If so, state the inclusive dates of such
21 activity:

- 22 A. Supply;
- 23 B. Importing;
- 24 C. Distribution;
- 25 D. Marketing;
- 26 E. Sale;
- 27 F. Labeling;
- 28 G. Manufacturing;

1 H. Brokering.

2 **RESPONSE TO INTERROGATORY NO. 30:**

3 On September 28, 1981, Tarkett purchased the worldwide assets of the GAF Corporation
4 Flooring Division. Tarkett sold vinyl floor tiles, sheet vinyls and felt-based materials from
5 approximately 9/28/81 - 12/31/81 some of which, upon information and belief, may have
6 contained asbestos to distributors of GAF who were in existence during the four month period.
7 That time period is an estimate based upon inventory turn calculation - inventories turned 5.2
8 times or approximately every 69 days. Under that calculation, any asbestos containing floor tile,
9 sheet vinyl and/or felt-based material would have been sold by 12/31/81. Tarkett did not
10 manufacture any asbestos-containing products.

11 **INTERROGATORY NO. 31:**

12 If your answer to any subpart of Interrogatory No. 31 [sic] regarding "ASBESTOS -
13 CONTAINING PRODUCTS" is in the affirmative, state:

14 A. The trade, brand name, and/or generic name of each such ASBESTOS-
15 CONTAINING PRODUCT MARKETED in any form or quantity between 1930 and 1985;

16 B. The date(s) each such ASBESTOS-CONTAINING PRODUCT was first
17 placed on the market, including the date(s) each such ASBESTOS-CONTAINING PRODUCT
18 was first MARKETED;

- 19 1. On an experimental basis;
20 2. On a test basis; or
21 3. For sale.

22 C. The date(s) each such ASBESTOS-CONTAINING PRODUCT:

- 23 1. Ceased to be produced; or
24 2. Was recalled from the market, if ever.

25 D. A detailed description of the chemical composition of each such
26 ASBESTOS-CONTAINING PRODUCT, including the type and/or grade of asbestos and/or
27 asbestos fiber contained in each such product and the quantitative percentage of asbestos or
28 asbestos fiber such product, and all non-asbestos components of the ASBESTOS-CONTAINING

VERIFICATION

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN FRANCISCO)

I have read the foregoing DEFENDANT TARKETT, INC.'S RESPONSES TO PLAINTIFFS' STANDARD INTERROGATORIES TO ALL DEFENDANTS PURSUANT TO GENERAL ORDER 129 and know its contents.

I am an authorized agent of Tarkett, Inc., a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on Jan 11, 1998, at Whitehall, Pennsylvania.

ALAN J. HUSAK
Type or Print Name


Signature