

IN RE: * IN THE

PERSONAL INJURY * CIRCUIT COURT

ASBESTOS CASES * FOR

* BALTIMORE CITY

* CONSOLIDATION NO. 89236704

* * * * *

**SUPPLEMENTAL RESPONSE OF PITTSBURGH CORNING CORPORATION TO
PLAINTIFFS' SUPPLEMENTAL INTERROGATORIES**

This Defendant manufactured an asbestos thermal insulation product, UNIBESTOS, from July 1, 1962 to on or about February 1, 1972. Unless otherwise stated in response to specific requests, the responses herein shall be limited to such product and time period. This Defendant objects to providing responses for any other period of time on the grounds that such additional information sought is irrelevant, immaterial, not calculated to lead to the discovery of admissible evidence and, furthermore, could be burdensome, expensive and harassing to comply with.

At various times, this Defendant also relabeled and sold certain types of mastic products as accessory products. Although all the formulations of these relabeled mastic accessory products are not now known, a few did include small amounts of asbestos fibers used as a binder, which fibers were encapsulated in a bituminous and/or resinous binder. These accessory products were not manufactured by this Defendant, were not used on high temperature insulation products such as UNIBESTOS and were not insulating materials. Those few mastic products which contained asbestos fibers as a binder have not been considered to be a source of asbestos fiber emissions. Consequently, such material was specifically exempted from certain regulations in the federal Environmental Protection Agency's National Emissions Standard for Asbestos, see 40 C.F.R. § 61.22 et seq., (now 40 C.F.R. § 61.148) and were exempt from the asbestos controls of the Consumer Products Safety Commission 16 C.F.R. § 1304.3(c). Similarly, the asbestos regulations of the Occupational Safety and Health Act, which require caution labels on asbestos products, did not apply to any material where asbestos fibers were modified by a binding agent, coating or binder. See 29 C.F.R. § 1910.1001(g)(2)(i) (now 29 C.F.R. § 1910.1001(j)(4)(i)).

The term asbestos is generically applied to several different minerals, may be found in various fiber types and may

be found in a wide variety of product forms, including ceiling tiles, floor tiles, gaskets, gloves, mastics, protective aprons, protective matting, etc. This Defendant objects generally to these requests as vague, overly broad, irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence so far as they relate or refer to unidentified asbestos-containing products or materials and will limit its responses as stated above.

This Defendant states that there never existed a predecessor corporation with respect to this Defendant. While this Defendant purchased on June 30, 1962 selected assets from Union Asbestos & Rubber Co., it did not purchase that company; that company continued to operate as a separate company for years and to sell other products including asbestos-containing products, it was not a predecessor corporation of this Defendant and on information and belief it or its successor continues to operate as an independent company to this date. Further, Defendant states that its responses to any request herein relate only to this Defendant and are not to be construed to imply the existence of a predecessor corporation.

- (c) to whom the document was addressed;
- (d) the subject matter of the document;
- (e) where a copy of said document is maintained.

RESPONSE: Objection. This interrogatory is overbroad, vague, ambiguous, argumentative, misleading and redundant and cumulative to Request for Production No. 9 in the set captioned by plaintiffs as "Plaintiffs' Request for Production of Documents Regarding Punitive Damages", the response thereto is incorporated herein. In addition, this Defendant specifically reserves the right to call any expert witness, witnesses, and/or introduce into evidence any document, exhibit or admissible evidence identified by any party to this litigation and/or presented during the pretrial proceedings of this case, for presentation of its case.

19. Did you send any documents which relate, refer or pertain to the non-disclosure of health hazards associated with exposure to asbestos or asbestos-containing products? If so, for each document state:

- (a) the date the document was prepared;
- (b) by whom the document was prepared;

- (c) the date the document was sent;
- (d) to whom the document was addressed;
- (e) the subject matter of the document;
- (f) where a copy of said document is maintained.

RESPONSE: Objection. This interrogatory is overbroad, vague, ambiguous, argumentative, misleading and redundant and cumulative to Request for Production No. 9 in the set captioned by plaintiffs as "Plaintiffs' Request for Production of Documents Regarding Punitive Damages", the response thereto is incorporated herein. In addition, this Defendant specifically reserves the right to call any expert witness, witnesses, and/or introduce into evidence any document, exhibit or admissible evidence identified by any party to this litigation and/or presented during the pretrial proceedings of this case, for presentation of its case.

20. State whether you or anyone on your behalf ever made any suggested changes in any reports, studies or writings concerning health hazards associated with exposure to asbestos or asbestos-containing products. If your answer is in the affirmative, please state:

- (a) the date such suggestions were made;
- (b) by whom such suggestions were made;
- (c) the suggestions made;
- (d) the reasons for such suggestions;
- (e) if such suggestions were memorialized in writing;
- (f) if such suggestions were memorialized in writing,

the location of a copy of said document reflecting such suggestions.

RESPONSE: Objection. This interrogatory is overbroad, vague, ambiguous, argumentative, misleading and redundant and cumulative to Request for Production No. 10 in the set captioned by plaintiffs as "Plaintiffs' Request for Production of Documents Regarding Punitive Damages", the response thereto is incorporated herein.

21. State whether you made any changes in any reports, studies, or writings concerning the health hazards associated with exposure to asbestos or asbestos-containing products. If so, please state:

- (a) the date such changes were made;
- (b) by whom such changes were made;
- (c) at whose direction the changes were made;
- (d) the document in which such changes were made;

(e) what changes were made;
(f) where a copy of the document reflecting such changes is maintained.

RESPONSE: Objection. This interrogatory is overbroad, vague, ambiguous, argumentative, misleading and redundant and cumulative to Request for Production No. 10 in the set captioned by plaintiffs as "Plaintiffs' Request for Production of Documents Regarding Punitive Damages", the response thereto is incorporated herein.

22. State whether you ever received or are in possession of any documents, reports, writings, or studies which were done by you or someone on your behalf concerning the health hazards associated with exposure to asbestos or asbestos-containing products, which were not made available, published or otherwise made available to members of the public. If your answer is in the affirmative, please state:

- (a) the title of the writing, report, document or study;
- (b) the date;
- (c) by whom prepared;
- (d) to whom it was sent;

(e) where a copy of the document, writing, report or study is maintained.

RESPONSE: Objection. This interrogatory is overbroad, vague, ambiguous, argumentative, misleading and redundant and cumulative to Request for Production No. 12 in the set captioned by plaintiffs as "Plaintiffs' Request for Production of Documents Regarding Punitive Damages", the response thereto is incorporated herein.

23. State whether you received any document, study, reports, or other writings concerning the health hazards associated with exposure to asbestos or asbestos-containing products, which documents were not made available through publication or otherwise to members of the public. If your answer is in the affirmative, please state:

- (a) the date of said document;
- (b) the date received by you;
- (c) by whom it was sent;
- (d) to whom it was sent;
- (e) the title of the document, if any;
- (f) the subject matter of the document;
- (g) where a copy of said document is maintained.

RESPONSE: Objection. This interrogatory is redundant to and cumulative with Interrogatory No. 22, the response thereto being incorporated herein. In addition, the interrogatory calls for speculation as to what was done with alleged information produced by an alleged third party.

24. State whether after you became aware of the health hazards associated with exposure to asbestos-containing products, you placed a warning on any of your asbestos-containing products. If so, please state:

- (a) the date you first became aware of said hazard;
- (b) the date you placed a warning on your product;
- (c) the language of the warning.

RESPONSE: The term asbestos is generically applied to several different minerals, may be found in various fiber types and may be found in a wide variety of product forms. This interrogatory is overly general and nonspecific as to the type of asbestos used by this Defendant in its thermal insulation product. This Defendant is unable to state when the corporation first became aware of any reported association between asbestos exposure and any particular health hazard.

Many of the individuals who were involved with Pittsburgh Corning Corporation in the early 1960's when the company first became involved with a thermal insulation product containing asbestos are now deceased. However, generally, at or about the time it entered the business, Pittsburgh Corning did acquire some information concerning asbestos as reflected in enclosures to two letters its Vice President, Karl Baumler, received in May, 1962. At that time, Pittsburgh Corning's awareness generally related mainly to manufacturing environments where it was understood that exposure to dust levels at or below the TLV level would not result in disease. Those articles did not impart any information that suggested that end users of such products were placed at risk of disease.

The information received in 1962 stated that asbestosis was a lung disease which may be suffered by some persons exposed to extreme and excessive amounts of asbestos fibers over long periods of time. Such information related primarily to heavily exposed asbestos textile manufacturing plant workers, whom it was believed had been exposed grossly in excess of the

established TLVs. That information reflected the accepted scientific belief that workers could be exposed to concentrations of asbestos at or below the ACGIH-approved threshold limit value of 5 MPPCF on a time-weighted average throughout their working life, without adverse effect and that asbestosis was not a disease expected to occur with any frequency in the United States due to better work practices. Pittsburgh Corning had no belief or understanding at that time that end users of its thermal insulation product were at any risk.

Pittsburgh Corning is now aware that as reports started to appear regarding a connection between a certain type of asbestos and mesothelioma, crocidolite asbestos was the implicated fiber type. Workers exposed only to amosite asbestos (the fiber type used in UNIBESTOS) were not found to have suffered the disease. None of the materials received by Pittsburgh Corning in 1962 mentioned mesothelioma.

Beginning perhaps as early as 1965, Pittsburgh Corning may have learned of a suspected connection between asbestos generally and mesothelioma. (Pittsburgh Corning is now aware of a late 1964

memorandum which suggests that a Pittsburgh Corning employee saw a newspaper article mentioning mesothelioma. That document was not contained in Pittsburgh Corning's files and Pittsburgh Corning is unable to authenticate the document.) The literature at that time revealed that amosite asbestos was not implicated in connection with mesothelioma or lung cancer. Thereafter, in 1966, Pittsburgh Corning's supplier of amosite asbestos, and the same company that a Pittsburgh Corning employee had visited while in England in 1965, confirmed that based on its review of the research that there was "not one case of mesothelioma associated with exposure to amosite asbestos." In fact, in an article published in September, 1972, (after Pittsburgh Corning had ceased manufacturing UNIBESTOS) Drs. Selikoff, Hammond and Churg reported that "there has been no evidence to indicate whether or not the amosite variety (of fiber) is also carcinogenic."

One article Pittsburgh Corning received in May, 1962, entitled: Some Clinical Observations of Asbestosis in Mine and Mill Workers, mentions lung cancer and asbestosis and says: "Moreover, a general

statistical survey of all employees in the industry does not seem to indicate any statistical evidence of a causal relationship." Another article received by Pittsburgh Corning in 1962, Pulmonary Disability in Asbestos Workers, states: "There are several reasons for different opinions expressed concerning the relationship of asbestosis and bronchogenic carcinoma. Differences in asbestos fibers are noted." Pittsburgh Corning believes these articles contain the first references to asbestosis and lung cancer that it received and that they show no causal relationship.

At no time prior to 1972 did the scientific literature contain any epidemiologic studies that implicated amosite (the type used in its thermal insulation product) as being causally related to an increased risk of lung cancer among humans. In a publication, Carcinogenicity of Amosite Asbestos, Archives of Environmental Health, Sept. 1972, the authors state: "Few data exist concerning the comparative neoplastic potential of the several kinds of asbestos in man. Some information is available for chrysotile, crocidolite and anthophyllite. However,

there has been no evidence to indicate whether or not the amosite variety is also carcinogenic."

Pittsburgh Corning has no understanding of "any other diseases" being produced by asbestos exposure. Pittsburgh Corning is aware that there is considerable debate today as to whether or not any type malignancy other than lung cancer, in conjunction with asbestosis and cigarette smoking, and mesothelioma are causally related to asbestos exposure and does not believe that medical science has generally concluded that there is any causal connection. Beginning in November 1968, this Defendant caused a 5-inch by 3-inch notice to be printed in red on all cartons containing UNIBESTOS. The notice read as follows: "This product contains asbestos fibers. If dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirator approved by U.S. Bureau of Mines." A copy of the warning label is attached. Further, in or about 1968, this Defendant participated in the distribution by mail and by hand of the National Insulation Manufacturers Association (NIMA) booklet to distributors describing precautions to be observed

when handling, applying, removing or ripping out asbestos thermal insulation products. A copy of the NIMA booklet is attached.

25. State whether after you became aware of the health hazards associated with exposure to asbestos or asbestos-containing products you continued to sell those products without any warnings and, if so, state:

(a) the date you became aware of the hazards;

(b) the period of time for each product that you continue to sell said product without a warning.

RESPONSE: See this Defendant's response to Interrogatory No. 24.

26. If you contend that you are not responsible for the alleged acts, omissions and/or liabilities for any predecessor in interest, state the facts upon which you base such contention and identify all documents in support thereof.

RESPONSE: This Defendant had no predecessor.

27. State whether after learning of the health hazards associated with exposure to asbestos or asbestos-containing products you informed those selling and/or distributing your product of those hazards. If so, state:

- (a) those informed;
- (b) the date(s) as to each;
- (c) who informed them;
- (d) what information was given;
 - (i) the author;
 - (ii) to whom sent;
 - (iii) the date;
 - (iv) where a copy of the writing is maintained.

RESPONSE: Objection. This interrogatory is vague, ambiguous, argumentative and misleading. Without waiving this objection, see this Defendant's response to Interrogatory No. 24 and copies of documents attached thereto.

28. Identify all documents that you will use in support of your defense that you are not liable for punitive damages.

RESPONSE: Pittsburgh Corning Corporation objects to this interrogatory to the extent that it calls for information protected by the attorney work product doctrine and that it attempts to shift the trial preparation burden from the plaintiffs to Pittsburgh Corning. Without waiving this objection, this Defendant specifically reserves the right to call any

expert witness, witnesses, and/or introduce into evidence any document, exhibit or admissible evidence identified by any party to this litigation and/or presented during the pretrial proceedings of this case, for presentation of its case.

29. State the name and address of each person whom you expect to call as an expert witness on the subject of punitive damages at trial. With respect to each such expert, state the following:

- (a) describe the expert's educational background;
- (b) describe the expert's employment and other professional history;
- (c) identify all asbestos-related cases in which the expert has testified as an expert witness, including title and number of case, court in which the case was pending, and the party for whom the expert testified.

RESPONSE: Pittsburgh Corning Corporation objects to this interrogatory as premature. Pittsburgh Corning will name its experts and any other required information pursuant to any pretrial schedule of the court. This Defendant specifically reserves the right to call any expert witness, witnesses, and/or introduce into

evidence any document, exhibit or admissible evidence identified by any party to this litigation and/or presented during the pretrial proceedings of this case, for presentation of its case.

30. State separately as to each expert you intend to call on the issue of punitive damages, the subject matter on which said expert is expected to testify, state the substance of the facts and opinions to which the expert is expected to testify, and set forth a summary of the grounds of each such opinion. Supplement this answer you ascertain any additional expert witnesses.

RESPONSE: Pittsburgh Corning Corporation objects to this interrogatory to the extent that it calls for information protected by the attorney work product doctrine and that it attempts to shift the trial preparation burden from the plaintiffs to Pittsburgh Corning. Without waiving this objection, this Defendant specifically reserves the right to call any expert witness, witnesses, and/or introduce into evidence any document, exhibit or admissible evidence identified by any party to this litigation and/or

presented during the pretrial proceedings of this case, for presentation of its case.

31. For each expert whom you expect to call on the issue of punitive damages as a witness at trial, identify by case name, date, court and docket number any deposition and/or trial testimony given by each such expert, and identify the custodian and location of such transcripts.

RESPONSE: See this Defendant's response to Interrogatory Nos. 28, 29 and 30, incorporated herein by reference.

32. State the name and address of each person whom you expect to call as a non-expert witness on your behalf on the issue of punitive damages at trial who has previously testified in a trial or deposition in a court or administrative proceeding involving asbestos-related cases, identify each such person by case name, date, court or administrative agency, and docket number of each such proceeding and identify the custodian and location of such transcript of that person's testimony at such proceeding.

RESPONSE: Pittsburgh Corning Corporation objects to this interrogatory on the grounds that it requests the disclosure of information protected by the attorney work product doctrine since the exact witnesses by whom a relevant fact may be proved at trial must depend, after consideration on many questions, upon

judgment, discretion, and mental processes of legal counsel who will actively conduct the litigation. Without waiving any of these objections, Pittsburgh Corning notes that it has identified corporate and fact witnesses in prior disclosure to this court and opposing counsel. Witnesses identified for trial have been made available for deposition. Pittsburgh Corning reserves the right to supplement this disclosure, as necessary.

33. Name any person, not heretofore mentioned, having personal knowledge of the facts material to the issue of punitive damages in this case.

RESPONSE: See this Defendants' response to Interrogatory No. 32. Pittsburgh Corning Corporation additionally objects to this interrogatory as overly broad, unduly burdensome, and harassing. The terms "any person" and "facts" are vague, ambiguous, and call for speculation. Without waiving this objection, this Defendant specifically reserves the right to call any expert witness, witnesses, and/or introduce into evidence any document, exhibit or admissible evidence identified by any party to this litigation and/or presented during

the pretrial proceedings of this case, for presentation of its case.

34. For each of your asbestos-containing products, indicate the purpose of asbestos fibers in the product formulation and state whether such asbestos fibers were necessary for the proper performance of the product as intended by you.

RESPONSE: Durability under high temperature. At all times that this Defendant manufactured its pipe insulation product, it was generally accepted that in high temperature applications for which UNIBESTOS was intended and used, there was no acceptable substitute product that provided the same function in terms of low thermal conductivity, light weight, strength, long-term durability under high temperature.

35. If you had a sales or other office or manufacturing facility located in Maryland, Pennsylvania, Delaware, Washington, D.C. and/or Virginia state the following:

(a) The address and type (whether sales office, executive offices, manufacturing, packaging, warehouse, shipping or other) of each office or facility;

(b) Dates each office or facility was open and in operation;

(c) The area or territory of responsibility for each such office or area or territory covered by the operations of each facility;

(d) The identity of any asbestos-containing products that were manufactured or packaged in such facility and the dates applicable thereto;

(e) The identity of any asbestos-containing products that were sold, distributed or supplied from each such office or facility and the dates applicable thereto.

RESPONSE: Objection. This interrogatory is overbroad, vague, ambiguous, nonspecific and unbounded by time restraints. Without waiving this objection, and for the period this Defendant manufactured UNIBESTOS, 1962-1972, this Defendant's General office was located at:

One Gateway Center
Pittsburgh, Pennsylvania

All sales orders were accepted in Pittsburgh, Pennsylvania. This Defendant had a regional office in Philadelphia, Pennsylvania. This Defendant manufactured its asbestos thermal insulation product,

UNIBESTOS, at Tyler, Texas from July 1, 1962 to on or about February 1, 1972; and Port Allegany, Pennsylvania from April 1, 1964 to on or about February 1, 1972. At the present time this Defendant's principal place of business is:
800 Presque Isle Drive
Pittsburgh, Pennsylvania 15239

36. If any product brochure, advertisement, bulletin or other document published by you identified jobsites in Maryland, Pennsylvania, Delaware, Washington, D.C. and/or Virginia where any of your asbestos-containing products were supplied, delivered, installed or applied, list each such product and jobsite, the dates or time period during which such asbestos-containing products were supplied, delivered, installed or applied and identify and attach copies of each brochure, advertisement, bulletin or document containing reference to each such jobsite.

RESPONSE: Objection. This interrogatory is overbroad, vague, ambiguous, nonspecific and unbounded by time restraints. Without waiving this objection, Pittsburgh Corning Corporation has attached to these

responses copies of all UNIBESTOS sales brochures in its corporate files for review by the plaintiffs.

37. If you ever received notification or awareness of the failure of any of your asbestos-containing products to perform as intended by you, or to remain in place after application, state:

- (a) The name of the product;
- (b) The problem or failure discovered or of which you became aware;
- (c) The date you initially became aware of such problem or failure;
- (d) The time period during which you received notification of continued existence of such problem or failure;
- (e) Any actions taken by you as a result of such awareness;
- (f) Any labelling placed by you on packages of such products providing notification of such problem or failure;
- (g) The identity of any document prepared by you relating to the problem or failure;
- (h) Any decision by you to withdraw the defective product or to limit its production and/or availability.

RESPONSE: Objection. This interrogatory is neither relevant nor reasonably calculated to lead to the discovery of

admissible evidence. In addition this interrogatory is vague and ambiguous as to the term "failure", and would cause this Defendant to speculate.

38. If you or any attorney or law firm representing you has in connection with an asbestos personal injury claim or asbestos property damage claim ever been fined or otherwise sanctioned by a court anywhere within the United States for improperly or inadequately responding to discovery requests or requests for production of documents, state:

(a) The identity of each judge and court which imposed any such fine or sanctions;

(b) The date of any such fine or sanctions;

(c) The amount of any fine;

(d) The details of any sanctions;

(e) The identity, title and business address of each person or persons fined or sanctioned;

(f) The date of any hearing or deposition conducted prior to the court's decision on any such fine or sanction;

(g) The identity of anyone testifying in any such hearing or deposition and the date thereof;

(h) If any such fine or sanctions were appealed;

(i) The decision on appeal;

(j) The case name and docket number of the proceeding in which any fine or sanctions were ordered.

RESPONSE: Objection. This interrogatory is argumentative, misleading, neither relevant nor reasonably calculated to lead to discovery of admissible evidence, not relevant for the determination and/or assessment of punitive damages, unbounded by time restraints and outside the scope of discovery. In addition, this interrogatory is designed to mislead and prejudice the trier of fact.

39. For each of your asbestos products, state whether you engaged in any advertising program to promote the sale of that product and, if so state:

(a) The name or description of each advertising media that you have used to promote the product during the period 1930 to 1980;

(b) The name of each national magazine or periodical in which you have advertised the product during the period 1930 to 1980.

(c) The date of each issue of such magazine or periodical in which such advertisement appeared;

(d) The name and address of each newspaper, in which it advertised the product during the period 1930 to 1980;

(e) The date of each publication of each newspaper in which the advertisement appeared;

(f) Identify and produce each document which refers, reflects or pertains to each such advertisement which was published in each such magazine, periodical and/or newspaper;

(g) State whether the advertising of the product was handled by an agency and, if so, state the name and address of each advertising agency that handled any portion of the advertising of the product during the period 1930 through 1980.

RESPONSE: Objection. This interrogatory is overbroad and seeks irrelevant information for a period of 32 years before this Defendant began the manufacture of UNIBESTOS, for a period of 7 years before this Defendant was incorporated and for a period of over 8 years after manufacture ceased. Without waiving this objection, this Defendant developed its own advertising, sales, and promotional programs. As far as this Defendant can reconstruct at this time advertisements for UNIBESTOS were placed in the following periodicals from time to time during the 1962 - 1971 period:

- Consulting Engineer - Actual Specifying

Engineer

- Chemical and Engineering News
- Plant Engineering
- Factory
- Marine Engineering Log
- Power
- Chemical Engineering
- Hydrocarbon Processing and Petroleum Refiner

40. For each brochure, pamphlet, specification, instruction, manual, bulletin, advertisement or other written material describing or relating to the use of each of your asbestos products produced by or for you or by any person associated with you or any related company or association;

(a) Describe its contents;

(b) State when, where, how, and to whom it was distributed;

(c) State the manner in which it was placed in the product container or whether it was separate from the product container;

(d) State whether any written, printed or graphic matter was present to warn of any potential harmful ingredient it might contain. If so, state:

(i) Whether a signal word, i.e. "danger", "warning" or "caution" was present;

(ii) Whether the signal word was printed in boldface, capital letters or different colored inks.

(iii) The wording of the statements describing any hazard;

(iv) The wording of all directions and/or instructions pertaining to any method of use to avoid any hazard.

(e) Identify each individual who participated in the writing of the brochure or other written materials and describe in detail the extent of his participation;

(f) Identify and produce each document which reflects, refers or relates to the information contained on the brochures, or other written materials and/or the decision to include such information;

RESPONSE: Objection. This interrogatory is overbroad, vague and ambiguous. Without waiving this objection, Defendant distributed a promotional brochure to distributors and customers describing UNIBESTOS and the uses for which it was intended. See attached copies of UNIBESTOS sales brochures and product data sheets. In addition, beginning in November 1968, this Defendant caused a 5-inch by 3-inch notice to be printed in red on all cartons containing UNIBESTOS. The notice read as follows: "This product contains asbestos fibers. If

dust is created when this product is handled, avoid breathing the dust. If adequate ventilation control is not possible, wear respirator approved by U.S. Bureau of Mines." A copy of the warning label is attached. Further, in or about 1968, this Defendant participated in the distribution by mail and by hand of the National Insulation Manufacturers Association (NIMA) booklet to distributors describing precautions to be observed when handling, applying, removing or ripping out asbestos thermal insulation products. A copy of the NIMA booklet is attached.

(g) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

RESPONSE: This Defendant believes that it has made a reasonable inquiry to assemble information within its control by which it has prepared these responses. This Defendant's responses to these interrogatories are based on information learned, assembled and reviewed over a number of years, in the course of business and in the course of litigating numerous claims throughout the country. It is not possible to designate the

particular source for information, received orally or otherwise, used to respond to each specific interrogatory.

41. State whether you have ever been the subject of any investigation or accusation by any Governmental Agency concerning the provisions of the Occupational Safety and Health Act of 1970 (P.L. 91-596, 29 U.S.C. Section 651 et seq.). If so state:

(a) The date of such investigation, accusation, or other administrative or judicial procedure or action;

(b) The administrative agency or Court in which any proceedings arising from such investigation or accusation were heard or instituted;

(c) The determination and results of any such accusation or action;

(d) The identity of each document which refers or relates to information set forth in answer to this interrogatory;

(e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

RESPONSE: Plaintiff was never employed by this Defendant and Defendant, therefore, objects to this interrogatory

because it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. In addition, this interrogatory is unbounded by time restraints and the information sought is equally available in public records to all parties. Without waiving this objection, this Defendant, from time to time, during 1962-1972 had air quality studies performed at its own manufacturing facilities by outside consultants retained for such purposes and by and in cooperation with federal and state health and labor agencies. See attached copies of government dust studies. See also this Defendant's response to Interrogatory No. 40(g).

42. State what action, if any, you have taken since 1930 to reduce or eliminate any risk of occupational disease or personal injury to those engaged in the manufacture of your asbestos products or to those using your asbestos products which arises from the inhalation of dust and fibers.

RESPONSE: Plaintiff was never employed by this Defendant and Defendant, therefore, objects to this interrogatory because it is irrelevant in part, immaterial and not calculated to lead to the discovery of admissible

evidence. In addition, this interrogatory is overbroad and seeks irrelevant information for a period of 32 years before this Defendant began the manufacture of UNIBESTOS, for a period of 7 years before this Defendant was incorporated and for a period of over 19 years after manufacture ceased. Without waiving this objection, as to its manufacturing employees, programs were ongoing from the startup of production in an effort to achieve good housekeeping. Pittsburgh Corning encouraged or required the use of respiratory protection in certain manufacturing processes involving raw asbestos fibers and made various engineering and plant improvements and modifications in order to continue to meet the TLVs. Pittsburgh Corning also held meetings about asbestos with employees during 1969-1971. This Defendant's employees at facilities manufacturing UNIBESTOS participated in periodic medical examinations during 1962-1971; this Defendant's records do not contain detailed information as to individual names, dates of examination, examining doctors, or results of examinations conducted through this period. See also this Defendant's response to

Interrogatory No. 24 and copies of documents attached thereto.

43. What technique, if any, did and/or do you use to make dust samplings in the manufacturing and packaging production environment or at job sites where your materials are used?

(a) Set forth in detail the technique used, when it was commenced and when, if ever, it was concluded;

(b) State the purpose for administering such samplings;

(c) State the results of such sampling;

(d) State what action, if any, has been taken in response to the findings as to the dust samples;

(e) Identify each document which refers or relates to such samplings;

(f) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

(g) Identify the living person who has the most knowledge of matters discussed herein.

RESPONSE: Plaintiff was never employed by this Defendant and Defendant, therefore, objects to this interrogatory

because it is irrelevant in part, immaterial and not calculated to lead to the discovery of admissible evidence. Without waiving this objection, this Defendant, from time to time, during 1962-1972 retained the Industrial Health Foundation, Pittsburgh, Pennsylvania and also Doctor Morton Corn, University of Pittsburgh, Pittsburgh, Pennsylvania, to make air-quality surveys at Defendant's asbestos thermal insulation product factories. In addition, an industrial hygiene study at the Tyler plant was conducted by J.T. Destefano in November, 1966. See attached copies of Corn studies and DeStéfano study. See also this Defendant's response to Interrogatory No. 41 and copies of documents attached thereto. This Defendant states that it had no control of job sites or job site workers and the numerous job site variables known only to, and capable of being affected only by insulation contractors, their employees or the employees' union. Therefore, this Defendant did not undertake or finance tests or studies at job sites.

44. Please state:

(a) Your knowledge as to any respirator or other breathing device which was on the market during the time period you produced, sold and/or distributed asbestos-containing products which would prevent the inhalation of asbestos dust and fibers;

(b) A detailed description of such respirator or other breathing device, together with all information as to how such device prevents the inhalation of asbestos dust and fibers;

(c) What tests, if any, were conducted, by whom and where, with regard to the effectiveness of any such device;

(d) Identify each document in your possession which refers or relates to the subject matter of this interrogatory;

(e) As to any information received orally in answer to this interrogatory, identify each person who supplied such information and state the full substance of the information supplied.

RESPONSE: This Defendant was not expert on the subject of respirators and relied on recommendations of the U.S. Bureau of Mines concerning the efficiency of respirators.

45. With respect to the period from 1930 to 1980, state the names, addresses and company title or position of each person who at any time during that period was in charge of the following activities with regard to each of the products identified in answer to Interrogatory 2:

- (a) Production;
- (b) Marketing;
- (c) Labeling;
- (d) Advertising;
- (e) Product Evaluation;
- (f) Research and development;
- (g) Distribution.

RESPONSE: Objection. This interrogatory is overbroad, vague and ambiguous. Without waiving this objection,

Russell Brittingham President	1962-1968
James H. Bierer President	1968-1972
Robert E. Buckley Vice President Sales	1962-1968
John H. Price, Jr. Vice President Sales	1968-1971
Richard Gaenzle General Sales Manager	1971-1972
Roy E. Fuhs Sales Manager	1962-1972

Industrial Division

Karl Baumler Vice President Manufacturing	1962-1965
Byrl M. Stout Vice President Manufacturing	1965-1969
Eugene W. Holman Vice President Manufacturing	1969-1972
James W. McMillan Works Manager, Tyler	1962-1967
Charles E. Van Horne Works Manager, Tyler	1968-1972
Byrl M. Stout Works Manager, Port Allegany	1962-1963
L.O. Griffith Works Manager, Port Allegany	1964-1968
W.J. Binder Works Manager, Port Allegany	1969-1970
C.P. Olm Works Manager, Port Allegany	1970-1972

This Defendant had a Research and Development Department, but that Department was not involved with either the development of UNIBESTOS or health and safety testing of same.

46. Identify each publication contained in your research or other library, or otherwise in your custody, including but not by way of limitation, all medical journals, industrial medical

journals, industrial hygiene journals, technical literature in the areas of asbestos mining, manufacture, application and use, and Governmental publications, dealing with occupational diseases arising from the manufacture and use of asbestos-containing products. As to all such publications, state the volumes which are in your custody and control, when each such volume was received and the present location of such publications.

RESPONSE: Objection. This interrogatory is overbroad, compound, unbounded by time restraints and outside the scope of discovery insofar as it seeks information developed in the defense of litigation (such information is protected by attorney-client privilege and/or attorney work product). Without waiving this objection, this Defendant did not maintain a library with respect to UNIBESTOS dealing with:

- a. Industrial hygiene
- b. Medicine
- c. Safety
- d. Engineering

In addition, as this Defendant understands this interrogatory, this Defendant and other parties have identified documents, exhibits and witnesses on their exhibit list. The Defendant specifically reserves the

right to call any expert witness, witnesses, and/or introduce any document, exhibit or admissible evidence identified by any party to this litigation and/or presented during the pretrial proceedings of this case for presentation of its case.

47. Have you been: (a) a member of or (b) affiliated in any manner with or (c) received reports or (d) subscribed for reports or publications to the Industrial Hygiene Foundation (also known as the Industrial Health Foundation) of Pittsburgh? If so, please provide the dates of membership, the dates when you received the Industrial Hygiene Digest and the amount of money you contributed in each year of membership.

RESPONSE: (a) No, with respect to 1962-1972

(b) No, however during the period 1966 through 1970, this Defendant participated in a study conducted by the Industrial Hygiene Foundation of America, Inc., chiefly to learn about the biochemical effects of amosite asbestos fibers on laboratory animals. A preliminary report indicated that amosite asbestos fibers were introduced into rats, and that asbestosis was noted in some of the animals that were autopsied according to schedule for study purposes. The

remaining animals were pastured for the purpose of observing whether lung cancer or mesothelioma tumors developed. According to Defendant's recollection, the pastured animals died unexpectedly in a laboratory epidemic about January 1972, before conclusions could be drawn concerning cancers or tumors. See attached copies of IHF studies. See also this Defendant's response to Interrogatory No. 43 and copies of documents attached thereto.

(c) & (d) No, with respect to 1962-1972, however see this Defendant's response to (b) above and copies of documents attached thereto.

48. With regard to the preceding Interrogatory, do you have any documents obtained from the Industrial Hygiene Foundation?

If so:

- (a) Identify and produce all such documents;
- (b) Who currently has them in their possession?
- (c) When was each received?
- (d) State the name of the individuals who received such documents or information contained in such documents.

RESPONSE: See this Defendant's response to Interrogatory No. 47(b) and copies of documents attached thereto.

49. Have you received any reports or documents prepared by Metropolitan Life Insurance Company from 1929 to about 1960, concerning statistical and/or other studies of asbestos workers for Johns-Manville? If so:

- (a) Identify and produce all such documents received;
- (b) Identify who received them and when;
- (c) Identify the current location of the documents.

RESPONSE: No.

50. State the name of all individuals who aided in the preparation of these answers, and for each such person, state:

- (a) Which interrogatories they helped prepare or the particular subject area for which they supplied information.
- (b) Their current position with the company;
- (c) Their current or last known home and business address and phone number.

RESPONSE: This Defendant states that Responses to Interrogatories in cases involving alleged injury due to exposure to asbestos-containing thermal insulation products historically were prepared by Robert E. Buckley, former Vice President and Assistant to the President of Pittsburgh Corning Corporation. Mr. Buckley was believed to be the single most

knowledgeable person employed by the corporation regarding its involvement in the manufacture and sale of UNIBESTOS. Mr. Buckley is deceased. Accordingly, these responses have been prepared at the direction of Richard C. McPherson, an officer of Pittsburgh Corning Corporation.

The address for Richard C. McPherson is as follows:

800 Presque Isle Drive
Pittsburgh, PA 15239

Employed by Pittsburgh Corning Corporation since 1973.

See also this Defendant's response to Interrogatory No. 40.

51. State whether you were a member of the Asbestos Information Association (A.I.A.) or in any manner received information or participated in any of the association's activities. If so, please state:

(a) The date and places of any A.I.A. meetings attended;

(b) The time period during which you were a member of the A.I.A.;

(c) The dates you received any publication of the A.I.A.;

(d) The name, address and telephone number of each and every person who attended such meetings and to whom any such publications were sent; and

(e) The identity, nature and content of all document pertaining to the AIA, including those furnished to you at such meetings or in such publications.

RESPONSE: No.

52. State all chemical, industrial, medical or trade associations to which you have belonged since 1930 (excluding the IHF, AIA and ATI), the dates of membership therein, the identity of any publications received as a result of membership therein and the amount of money you contributed in each year of membership.

RESPONSE: Objection. This interrogatory is overbroad and seeks irrelevant information for a period of 32 years before this Defendant began the manufacture of UNIBESTOS, for a period of 7 years before this Defendant was incorporated and for a period of over 19 years after manufacture ceased. Without waiving this objection, this Defendant was, at various times, a member of National Insulation Manufacturers Association (NIMA) some, but not all, of whose members were in the

asbestos product business. This Defendant became a member of National Insulation Manufacturers Association (NIMA) in the late 1950's or early 1960's. Defendant now understands that the records of NIMA show that Defendant resigned about November 1965. This Defendant apparently rejoined at some later date, possibly in 1968. The Thermal Insulation Manufacturers Association (TIMA) is a successor association to National Insulation Manufacturers Association (NIMA). By reason of being a supplier, this Defendant has been, since the 1950's, and is regarded as an associate member of the National Insulation Contractors Association, and was and is permitted to attend certain social functions at NICA conventions.

53. With regard to the associations enumerated in answer to the preceding Interrogatory, state:

(a) The names of each individual associated with the answering Defendant since that date who have had dealings with each said association;

(b) Describe the nature of their dealings with each such association;

(c) State their last known address;

(d) If still employed, their current job and title.

RESPONSE: Objection. This interrogatory is overbroad, vague and ambiguous. Without waiving this objection, see attached copy of NIMA minutes.

54. Have you ever been a member of the Asbestos Textile Institute (ATI)? If so, please state:

(a) When did you first become a member;

(b) When did you discontinue membership; and

(c) The identity, nature and contents of all documents pertaining to the ATI, including but not limited to, those furnished to you at ATI meetings and/or in ATI publications; and

(d) What were the requirements for membership, including initiation and annual membership dues, for each year in which Defendant was a member.

RESPONSE: No.

55. How much have you contributed annually to the Asbestos Textile Institute in each year since 1936?

RESPONSE: Not applicable to this Defendant. See this Defendant's response to Interrogatory No. 54.

56. As to any asbestos threshold limit values ever published by the American Conference of Governmental Industrial Hygienists, state whether you ever brought such information to the attention of purchasers, users, sellers and/or suppliers of your asbestos products. If you did not do so, state the reasons why not.

Brian C. Parker, Esquire
Gebhardt & Smith
The World Trade Center, 9th Floor
Baltimore, Maryland 21202

Attorney for Plaintiffs

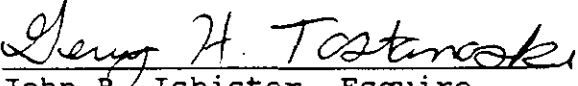
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Annapolis, Maryland 21404

Attorney for Plaintiffs

Joseph F. Rice, Esquire
Ness, Motley, Loadbolt,
Richardson & Poole
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P.O. Box 1137
Charleston, South Carolina 29402

Attorney for Plaintiffs

A Notice of Service was mailed by first class mail,
postage prepaid to all February 18, 1992 defense counsel.


John B. Isbister, Esquire
Gerry H. Tostanoski, Esquire

RESPONSE: This Defendant recognized applicable Threshold Limit Values as promulgated by the American Conference of Governmental Industrial Hygienists; as related to manufacturing environments it was generally understood this exposure to dust levels at or below the TLV level would not result in asbestosis. To the best of this Defendant's knowledge Defendant became aware of Threshold Limit Values then in effect as established by The American Conference of Government Industrial Hygienists pertaining to the concentration of airborne asbestos fibers in manufacturing environments in 1962 about the time Defendant purchased the UNIBESTOS product and selected related assets and facilities from Union Asbestos and Rubber Company (UNARCO). See copy of TLV attached. The Threshold Limit Values were published information available to any user of any material; this Defendant is unable to be sure at this point what any of its employees in the 1960's may have said to anyone else concerning this issue. See also this Defendant's response to Interrogatory No. 24 and copies of documents attached thereto.

57. Please state the total number of your present or former employees, categorized by manufacturing plant, contract unit or other business division, who are now receiving or who have ever received benefits under any Occupational Disease or Workmen's Compensation Statute for each year from 1930 until the present time for each of the following:

- (a) Asbestosis;
- (b) Lung Cancer;
- (c) Mesothelioma;
- (d) Any other pulmonary disorder;
- (e) Gastrointestinal System Cancer.

RESPONSE: Plaintiff was never employed by this Defendant and Defendant, therefore, objects to this interrogatory because it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. Without waiving this objection, this Defendant states no Workmen's Compensation claims such as described in this interrogatory were filed against it until March 1972, after this Defendant had ceased the manufacture of its asbestos thermal insulation product UNIBESTOS.

58. Please state if any of the physicians, industrial hygienists, or other persons identified by you in these answers to interrogatories ever made at any time any recommendations and/or suggestions to you pertaining to the risks or hazards to persons involved in the manufacturing or use of any asbestos-containing product. If so, please state:

(a) When was each such recommendation and/or suggestion made?

(b) To whom was each such recommendation and/or suggestion made?

(c) By whom was each such recommendation and/or suggestion made?

(d) The substance of each recommendation and/or suggestion.

(e) The identity of all writings addressed, directed or submitted to you pertaining to the subject matter of this interrogatory.

RESPONSE: Plaintiff was never employed by this Defendant and Defendant, therefore, objects to this interrogatory because it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence. In addition, this interrogatory is overbroad, vague, nonspecific, compound, misleading,

confusing and premised upon an erroneous assumption of fact. Without waiving this objection, in or around January, 1969, this Defendant's medical consultant stated that the suspected connection, in certain circumstances, between certain types of asbestos and certain adverse health consequences suggested the possibility that the asbestos in UNIBESTOS could perhaps eventually lead to adverse health consequences. This Defendant's medical consultant further suggested: The use of a warning label with the product; that the NIMA pamphlet be circulated; and that efforts be made to find a substitute for asbestos in UNIBESTOS. All of said "suggestions" had already been accomplished or initiated by Defendant.

59. Please state each private meeting or discussion held at any time before December 31, 1972 between any of your directors, officers, or employees and any officer or employee of any other manufacturer or seller of asbestos or asbestos-containing products in which the safety of any asbestos-containing product was a subject of discussion. As to each such meeting or discussion, please state:

(a) Its date;

- (b) Its location;
- (c) The participants in the meeting or discussion identified by name, title and business affiliation;
- (d) A description of all statements made by each participant concerning the safety of any asbestos-containing product;
- (e) The identity of all writings pertaining in any manner to the matters covered in this interrogatory.

RESPONSE: Objection. This interrogatory is overbroad, vague, nonspecific and argumentative as to the term "private". In addition, the term "safety" calls for speculation on the part of this Defendant. Without waiving this objection, see attached copies of minutes of the Board of Directors, 1962-1972, where UNIBESTOS was discussed.

60. Please state whether you exported asbestos-containing products to a country without attaching warning or caution labels regarding the potential health hazards of asbestos exposure on the packaging of each such product after you had sold, supplied or distributed the same or similar types of products in the United States with such warnings. If so, please state:

- (a) The generic and brand name of each such product exported;
- (b) The asbestos content, by type, weight and volume, of each such product exported;
- (c) The dates when you began and ceased exporting each such product;
- (d) The countries to which you exported each such product;
- (e) The dates, content and description, by size and color, of any warning or caution labels regarding the potential health hazards of asbestos exposure which were placed on the packaging of each such product exported;
- (f) The identity of each of your directors, officers and/or employees who participated in making the decision to export such products; and
- (g) The identity of all documents pertaining to the export of each such product and the custodian thereof.

RESPONSE: Objection. This interrogatory is overbroad, vague, nonspecific and irrelevant to any issue herein. Without waiving this objection, no. See this Defendant's response to Interrogatory No. 24 and copies of documents attached thereto.

61. Please state whether you exported asbestos-containing products to a country after those same or similar types of products had been banned in the United States. If so, please state:

(a) The generic and brand name of each such product exported;

(b) The asbestos content, by type, weight and volume, of each such product exported;

(c) The dates when you began and ceased exporting each such product;

(d) The countries to which you exported each such product;

(e) The dates, content and description, by size and color, of any warning or caution labels regarding the potential health hazards of asbestos exposure which were placed on the packaging of each such product exported;

(f) The identity of each of your directors, officers and/or employees who participated in making the decision to export such products; and

(g) The identity of all documents pertaining to the export of each such product and the custodian thereof.

RESPONSE: Objection. This interrogatory is vague and ambiguous as to the term "banned", and neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, not applicable to this Defendant as this Defendant ceased the manufacture of its asbestos-containing thermal insulation product, UNIBESTOS, on or about February 1, 1972.

62. State whether you ever received a publication known as the "Asbestos Magazine". If so, please state:

(a) The dates you received such publication;

(b) The terms, circumstances or requirements of receipt of such publication, e.g., free, by subscription, distributed at meetings, etc.;

(c) The identity and custodian of any copies of such magazine that you received.

RESPONSE: No, however a random copy may have found its way into Defendant's hands during 1962-1972.

63. Please state whether you recalled any asbestos product or otherwise attempted to remove it from the stream of commerce after you became aware of the potential health hazards of asbestos exposure.

(a) If so, please state when, why and how you performed such a recall for each such product.

(b) If not, please state the reason for not doing so and the identity of all corporate officials responsible for not doing so.

(c) Identify all documents pertaining to the subject matter of this interrogatory.

RESPONSE: Objection. This interrogatory is overbroad and vague as to the phrase "potential health hazards of asbestos exposure". Without waiving this objection, not applicable to this Defendant as this Defendant did not recall any shipment of its asbestos thermal insulation product, UNIBESTOS. This Defendant manufactured UNIBESTOS in ready-to-use 3-foot long rigid half-cylinders, to be fastened to the outside surface of a pipe with two bands of wire or metal. The end of an

occasional piece might need to be trimmed to achieve a tight fit. At the time of this Defendant's initial manufacture and sale of UNIBESTOS this Defendant did not believe that the application of UNIBESTOS in the intended manner caused the liberation of any significant amounts of asbestos fibers. At a much later date, and shortly before it ceased manufacturing UNIBESTOS, it learned that asbestos fibers in amounts that were more significant could be liberated during certain cutting practices; however, this Defendant had been printing a warning on the products shipping cartons and it had participated in a campaign to distribute literature to its customers regarding safe handling and use of asbestos-containing insulation materials. See this Defendant's response to Interrogatory No. 24 and copies of documents attached thereto.

64. Please provide the approximate market share of each of your asbestos products, individually or by category, identified in Interrogatory No. 2 which you sold, supplied and/or distributed in Maryland, Washington, D.C., Pennsylvania, Delaware and/or the United States for each year from 1930 to 1981.

Identify all documents pertaining to the subject matter of this Interrogatory.

RESPONSE: Objection. This interrogatory is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. In addition, this interrogatory is overbroad and seeks irrelevant information for a period of 32 years before this Defendant began the manufacture of UNIBESTOS, for a period of 7 years before this Defendant was incorporated and for a period of over 9 years after manufacture ceased.

65. Please state whether you used, installed, applied and/or removed asbestos-containing materials from any of your own buildings and/or facilities. If so, state:

- (a) the purpose for each such action;
- (b) the location of the buildings and/or facilities;
- (c) the dates for each such action;
- (d) the persons responsible for deciding to undertake such action;
- (e) how each such action was accomplished by the workers who were removing the asbestos-containing materials;

(f) what respiratory protection was recommended and/or required for the workers who were removing the asbestos-containing materials, and if so, the dates thereof; and

(g) the identity of any employees who alleged asbestos-lung disease or filed a Workers' Compensation claim alleging asbestos lung disease as a result of such work, and if so, all dates thereof.

RESPONSE: Objection. This interrogatory is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is unclear as it is unbounded by time restraints. Without waiving this objection, this Defendant's product UNIBESTOS was a high temperature pipe covering and thus not required at this Defendant's facilities, therefore UNIBESTOS was never installed in any of the Defendant's own buildings.

66. Please state whether you or any of your directors, officers or officials ever owned any financial interest of stock in any company other than yours which was involved in the mining, manufacturing, production, sale, supply or distribution of asbestos or any asbestos-containing product, including but not limited to, Metropolitan Life Insurance Co., co-Defendants in

this case and bankrupt asbestos companies, e.g., Johns-Manville Corporation and its subsidiaries and affiliated companies. If so, please state:

(a) The identity of the entity or persons who owned such interest;

(b) The job title and position of each person who owned such interest;

(c) The value of such interest owned by each such entity or persons; and

(d) The dates of such ownership by each such entity or persons.

RESPONSE: Objection. This interrogatory is neither relevant nor calculated to lead to the discovery of admissible evidence, is unbounded by time restraints and beyond the scope of discovery and the scope of this litigation.

Respectfully submitted,


John B. Isbister
Gerry H. Tostanoski
Tydings & Rosenberg
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Baltimore, Maryland 21202
(410) 752-9700

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)

) SS:

COUNTY OF ALLEGHENY)

BEFORE ME, the undersigned authority in and for said Commonwealth and County, personally appeared Richard C. McPherson, who being duly sworn deposes and says that he is Vice President of Human Resources with Pittsburgh Corning Corporation, that he is authorized to make this affidavit on its behalf and that the facts contained in the foregoing Supplemental Interrogatories are based on previous responses to similar Supplemental Interrogatories compiled by Robert E. Buckley who was a former Vice President and Assistant to the President of Pittsburgh Corning Corporation and who has sworn that said responses were true and correct to the best of his knowledge or information and belief.

Richard C. McPherson

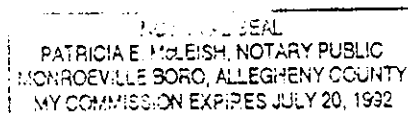
R. C. McPherson

SWORN TO AND SUBSCRIBED BEFORE ME

this 19th day of December 1991

Patricia E. McLeish

Notary Public



Member, Pennsylvania Association of Notaries

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20 day of December 1991, a copy of the Supplemental Response of Pittsburgh Corning Corporation to Plaintiffs' Supplemental Interrogatories was mailed by first class mail, postage prepaid, to:

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Gary J. Ignatowski, Esquire
R. Bruce McElhone, Esquire
Andrew M. Cantor, Esquire
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