NO. 88-8220-L

LILLIAN CHAPPELL, Individually and as Personal Representative of the Heirs and Estate of JAMES CHAPPELL, Deceased, et al.	)	IN THE DISTRICT COURT OF
VS.	)	DALLAS COUNTY, TEXAS
OWENS-CORNING FIBERGLAS CORPORATION, et al.	)	193RD JUDICIAL DISTRICT

KEENE CORPORATION'S ANSWERS TO PLAINTIFFS' SECOND SET OF INTERROGATORIES

COMES NOW Defendant, KEENE CORPORATION, and files this its Answers to Plaintiffs' Second Set of Interrogatories in the above-styled and numbered cause.

Respectfully submitted,

ATCHLEY, RUSSELL, WALDROP and HLAVINKA

J. Dennis Chambers
State Bar No. 04073800

1710 Moores Lane -- P. O. Box 5517
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ATTORNEYS FOR DEFENDANT,
KEENE CORPORATION

Blumberg No. 5113 PLAINTIFF'S EXHIBIT KN208

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing DEFENDANT, KEENE CORPORATION'S, ANSWERS TO PLAINTIFFS' SECOND SET OF INTERROGATORIES has been forwarded to counsel of record for Plaintiff herein, Mr. Russell Budd, BARON & BUDD, The Centrum, 3102 Oak Lawn Avenue, Suite 1100, Dallas, Texas, 75219, by certified mail, return receipt requested, and a like copy to all other counsel of record by mailing same postage prepaid on this 20th day of September, 1991.

J. Dennis Chambers

NO. 88-8220-L

LILLIAN CHAPPELL, Individually and as Personal Representative of the Heirs and Estate of JAMES CHAPPELL, Deceased; LAWRENCE CHITWOOD and PHYLLIS CHITWOOD, GEORGE HUBBARD; GEORGE PACK; ROGER PATTERSON and PATTERSON,	§	IN THE DISTRICT COURT OF
Plaintiffs,	§	DALLAS COUNTY, TEXAS
vs.	§	
OWENS-CORNING FIBERGLAS CORPORATION, et al,	§	
Defendants.	§	193RD JUDICIAL DISTRICT

KEENE CORPORATION'S ANSWERS TO
PLAINTIFFS SECOND SET OF INTERROGATORIES
INTRODUCTION

Keene Corporation ("Keene") has never mined asbestos, nor manufactured, processed, fabricated, routinely sold, distributed, or otherwise placed into commerce thermal insulation or acoustical products containing asbestos. A former subsidiary of Keene, Keene Building Products Corporation ("KBPC"), and KBPC's corporate predecessors, Baldwin-Ehret-Hill, Inc. ("BEH"), a Pennsylvania corporation, Ehret Magnesia Manufacturing Company ("Ehret"), a Pennsylvania corporation, and Baldwin-Hill Company ("B-H"), a New Jersey corporation, did at one time manufacture and sell thermal insulation or acoustical products containing asbestos. Keene expressly denies that it is the successor to the unknown and unforeseen contingent tort, contractual, or other liabilities of

KBPC, BEH, and BEH's corporate predecessors.

Keene was formed in 1967 and acquired substantially all of the stock of BEH in 1968. BEH became a subsidiary of Keene. BEH resulted from a 1959 merger of Ehret and B-H. In 1970, BEH was merged, and its business was transferred, into another Keene subsidiary, KBPC. KBPC, BEH, and BEH's corporate predecessors manufactured and sold insulation products, including some thermal insulation and acoustical products containing asbestos.

None of the companies was ever in the business of mining, milling, distributing, or importing raw asbestos fiber. During the 1960's, BEH commenced efforts to eliminate asbestos from its products. By 1972, all asbestos was removed from the thermal insulation and acoustical products manufactured by KBPC which contained it. KBPC ceased to be a Keene subsidiary in 1974 and some assets of KBPC were transferred to Keene and the remainder of the assets remained in KBPC whose stock was sold to a third party. Documents generated after that date are not relevant to this lawsuit.

The information provided in these responses is based upon knowledge obtained through a review of Keene's documents and records and through a review of existing documents and records of KBPC, BEH, and BEH's corporate predecessors.

Many of the events which may be relevant to the issues in this lawsuit occurred prior to Keene's purchase of the stock of BEH. In addition, much of the information being sought by

plaintiff involves events which occurred decades prior to the commencement of this suit. Many of the individuals who might have had personal knowledge of the matters to which plaintiff's discovery relates are deceased or are otherwise unavailable to Keene, and investigations to date indicate that at least some of the documents which relate to the matters inquired about were discarded in the regular course of business prior to commencement of the asbestos personal injury litigation.

Furthermore, no single individual can now be found who is aware of all facts relevant to this litigation. Information must be assimilated from those records which still exist and from former employees of companies other than Keene. Accordingly, Keene can only relay this information; it cannot attest to the accuracy or truthfulness of such responses. Information of this nature is being supplied because it may lead to the discovery of admissible evidence.

For these reasons, the information being provided in these responses may be incomplete. Keene is engaged in a continuing investigation into the subject matter sought by this discovery, and its responses are based upon this investigation. Keene cannot exclude the possibility that its continued investigation may at some future time reveal more complete information, or even information which indicates that an answer which is now being supplied is incorrect. Keene reserves the right to supplement these responses at a future date if additional

information is discovered.

Unless the context requires a contrary interpretation, the terms "defendant," "you," or "your" as used herein refer to KBPC, BEH, and BEH's corporate predecessors only, and are not intended to include or refer to Keene alone or in part. Answers referring to the manufacture, distribution, purchase, or sale of thermal insulation or acoustical products containing asbestos or any activities related thereto are based upon acts of KBPC, BEH, and BEH's corporate predecessors.

To the extent that the information contained herein differs in any respect from any prior response to discovery, these responses shall be deemed to update and supersede such prior response in any and all cases.

This introduction is explicitly incorporated into each of the responses hereinafter provided.

GENERAL OBJECTIONS

Keene generally objects to these interrogatories as being unduly burdensome, harassing, oppressive, vexatious, boilerplate, overly broad as to time, scope, or location, vague, lacking in particularity, and repetitious. The use of the words "any," "all," "each," or "every" is overly broad and objected to. Objection is made to the extent these interrogatories assume the truth of facts not proven or facts not in evidence. Objection is made to these interrogatories on the grounds that they seek information which is

not relevant or not reasonably calculated to lead to the discovery of admissible evidence. Objection is also made to these interrogatories to the extent that they seek information or materials which have been gathered or prepared in the course of the asbestos litigation, or which are otherwise protected by the attorney-client privilege, the work product doctrine, or by any other applicable privilege. Keene also objects to these interrogatories to the extent that they seek confidential, trade secret, or other proprietary information or materials.

Keene further objects to these interrogatories to the extent that they improperly call for a legal, medical, or scientific opinion or conclusion which Keene is not qualified to render.

To the extent these interrogatories seek information regarding health risks to individuals who worked at plants where thermal insulation or acoustical products containing asbestos were manufactured, Keene objects on the ground that such information is not relevant or not reasonably calculated to lead to the discovery of admissible evidence. See, e.g., Wesley Theological Seminary v. U.S. Gypsum, 876 F.2d 119 (D.C. Cir. 1989); Lohrmann v. Pittsburgh-Corning Corp., 782 F.2d 1156, 1164-1165 (4th Cir. 1986); Catasaqua Area School District v. Raymark Industries, 662 F. Supp. 64 (E.D. Pa. 1987); Smith v. Celotex, 564 A.2d 209 (Pa. Sup. Ct. 1989); and Martin v. Johns-Manville Corp., 508 Pa. 154, 175, 494 A.2d 1088, 1099 (1985).

Keene further objects to these interrogatories to the extent they seek medical records or other privileged personnel information, and Keene will not provide such information absent an appropriate waiver of the applicable privilege.

Keene does not concede that any of its answers to these interrogatories are or will be admissible evidence at a trial of this action, and Keene does not waive any objection, on any ground, whether or not asserted herein, to the use of any such answer at trial.

These General Objections are explicitly incorporated into each of the responses hereinafter provided.

1. For each document listed below, please answer whether such document is a true correct duplicate of a genuine and authentic document:

EXHIBIT NO.	DESCRIPTION
(a) KN 113	Two medical articles: "Asbestos Dust Called a Hazard to at least one-fourth of U.S., "The New York Times, March 2, 1966; "MDs Study Effects of Asbestos Dust," N.Y. World-Telegram, March 2, 1966. (1 page)

ANSWER TO INTERROGATORY NUMBER 1a: Not a Keene document therefore Keene is unable to answer this interrogatory.

(b) KN 114	Letter dated June 6, 1966, to John Boyer from J.P. Verhalen with enclosure: Letter dated June 3, 1966, to Alton Evans form John O'Rourke. (2 pages)

ANSWER TO INTERROGATORY NUMBER 1b: Keene states that to

the best of Keene's current knowledge, Keene is unaware that the referenced documents are a part of Keene's Document Depository. Therefore Keene is without sufficient knowledge and information to answer this interrogatory.

(c) KN 115 Draft of the Minutes of the Spring Meeting of the Sprayed Mineral Fiber Manufacturers association, Inc. dated June 17, 1966. (4 pages)

ANSWER TO INTERROGATORY NUMBER 1c: Keene states that to the best of Keene's current knowledge, Keene is unaware that the referenced documents are a part of Keene's Document Depository. Therefore Keene is without sufficient knowledge and information to answer this interrogatory.

(d) KN 116 Letter dated Aug. 22. 1966, to M. Lieff, H. Wilson, and F. Stumpf, with c.t. to Verhalen and Boyer, form H.L. Levine. (2 pages)

ANSWER TO INTERROGATORY NUMBER 1d: Keene states that to the best of Keene's current knowledge, Keene is unaware that the referenced documents are a part of Keene's Document Depository. Therefore Keene is without sufficient knowledge and information to answer this interrogatory.

(e) KN 117 Letter dated Sept. 29, 1966, to Business Representatives, Affiliated Local Unions and Craft Councils from J.A. Cinquemani, Executive Sec. of the L.A. Bldg. & Constr. Trades Council.(2 pages)

ANSWER TO INTERROGATORY NUMBER 1e: Not a Keene document therefore Keene is unable to answer this interrogatory.

(f) KN 118 Letter dated Dec. 15, 1966, to J.P. Verhalen from F.M. Stumpf re Dust Tests. (1 page)

ANSWER TO INTERROGATORY NUMBER 1f: Keene states that to the best of Keene's current knowledge, Keene is unaware that the referenced documents are a part of Keene's Document Depository. Therefore Keene is without sufficient knowledge and information to answer this interrogatory.

(g) KN 119 Dust Collection Data from tests conducted on USMP, BEH, S&K, and Asbestospray products, Spray Date: Jan. 12, 1967, Integrity and Density: Jan 18, 1967, signed S.D. Sumski. (3 pages)

ANSWER TO INTERROGATORY NUMBER 1g: Keene states that to the best of Keene's current knowledge, Keene is unaware that the referenced documents are a part of Keene's Document Depository. Therefore Keene is without sufficient knowledge and information to answer this interrogatory.

(h) KN 120 Report of Environmental Health Study from William R. Bradley to the Sprayed Mineral Fiber Manufacturers Association, Inc.; attention; Technical Committee; dated Jan. 23, 1967. (6 pages)

ANSWER TO INTERROGATORY NUMBER 1h: Keene states that the referenced exhibit appears to be a copy of a document from Keene's

document depository.

(i) KN 121 Letter dated Feb. 10, 1967, to James Verhalen from John Boyer with enclosure: Letter to James Verhalen, Pres. of the SMFMA, form George Sherman, Chief of the Div. of Industrial Safety of CA dated Feb. 7, 1967. (3 pages)

ANSWER TO INTERROGATORY NUMBER 1i: Keene objects to this interrogatory on the grounds that it seeks information which has been gathered or prepared in the course of the asbestos litigation or which is otherwise protected by the attorney-client privilege, the work product doctrine or by any other applicable privilege.

(j) KN 122 Letter dated March 13, 1967, to Wittkop, Verhalen, Binger, Levine and Boyer of the SMFMA from Frank Stumph enclosing copies of a report on sprayed fiber air sampling tests conducted for the SMFMA on March 1, 1967, by William R. Bradley. (5 pages)

ANSWER TO INTERROGATORY NUMBER 1j: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(k) KN 123 Two page report of environmental health study of an operator spraying products dated June 16, 1967 from William R. Bradley to Dr. M. Lieff. (2 pages)

ANSWER TO INTERROGATORY NUMBER 1k: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(l) KN 124 Letter dated Sept. 6, 1967, to Binger and others of the SMFMA from R.H. Toth, Chairman of the Promotional Comm. of the SMFMA, enclosing a newspaper article: "Widow Sues, Says Asbestos Caused Husband's Death, "The Daily Home News, New Brunswick, N.J., Aug. 1967. (2 pages)

ANSWER TO INTERROGATORY NUMBER 1l: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository except for the marginalia.

(m) KN 125 Letter dated June 6, 1968, to District Sales MGRS> -SCSD- and Phrospray Manual Holders from Lee Jenne, B-E-H Pyrospray Brochure and article entitled "Fireproofing Pumped Up 40 Stories," reprinted from Engineering News Record. (3 pages)

ANSWER TO INTERROGATORY NUMBER 1m: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(n) KN 126 Letter dated June 28, 1968, to Wittkop, Toth, and O'Rourke with c.t. to Binger from H.L. Leveine of the SMFMA. (2 pages)

ANSWER TO INTERROGATORY NUMBER 1n: Keene states that to the best of Keene's current knowledge, Keene is unaware that the referenced documents are a part of Keene's Document Depository. Therefore Keene is without sufficient knowledge and information to answer this interrogatory.

(o) KN 127 Confidential Conference Report dated Feb. 28, 1969, of a meeting held on Feb. 25, 1969, at MJA between Keene and the agency . (2 pages)

ANSWER TO INTERROGATORY NUMBER 1o: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(p) KN 128 Keene Corp. Mfg. Dib. report form James I. Saylor dated July 19, 1969, presenting results of dust samples taken in the Batch Dept. and the Cutting Dept. in Valley Forge PA. (4 pages)

ANSWER TO INTERROGATORY NUMBER 1p: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(q) KN 129 Invoice Nos. ZM 57248 & 57152 dated Oct. 14, 1969, from Johns-Manville Products Corp. for insulation materials sent to Keene Corp. (3 pages)

ANSWER TO INTERROGATORY NUMBER 1q: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(r) KN 130 Keene Corp. Industrial Insulation Div. Requisition Order No., 15689 dated June 3, 1970, to Johns-Manville for bags of asbestos. (1 page)

ANSWER TO INTERROGATORY NUMBER 1r: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(s) KN 131 Memo dated Oct. 8, 1970, to D. Kaplan, Valley Forge Plant, form Anthony Cucchiaro, Mgr. of Distribution for the Industrial Insulation Div.

(1 page)

ANSWER TO INTERROGATORY NUMBER 1s: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(t) KN 132 Internal Correspondence dated Oct. 16, 1970, to Boris Stern from A.P. Mueller re Spraycraft, Linden Plant. (10 Pages)

ANSWER TO INTERROGATORY NUMBER 1t: Keene states that to the best of Keene's current knowledge, Keene is unaware that the referenced documents are a part of Keene's Document Depository. Therefore Keene is without sufficient knowledge and information to answer this interrogatory.

(u) KN 133 Letter dated Oct. 22 1970, A.R.Cucchiaro, Mgr. of Distribution KN Corp. Industrial Insulation Div of Johns-Manville, enclosing copies of data sheets on asbestos fibre grades and rail rates from Canadian J-M Asbestos Fibre Div. (6 pages)

ANSWER TO INTERROGATORY NUMBER 1u: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(v) KN 134 Keene Corp. Industrial Insulation Div. memo dated Nov. 2, 1970, to Dr. M.L. Pearce from Anthony R. Cucchiaro re Asbestos fibre between NAAC and KN. (4 pages)

ANSWER TO INTERROGATORY NUMBER 1v: Keene states that the referenced exhibit appears to be a copy of a document from Keene's

document depository.

(w) KN 135 Letter dated Nov. 30. 1970, to A. Cucchiaro of Keene Corp. from Joan Holtze of North American Asbestos Corp. enclosing the purchase agreement for the sale of asbestos fibre between NAAc and KN. (4 pages)

ANSWER TO INTERROGATORY NUMBER 1w: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(x) KN 136 Keene Corp. Purchase Order for amosite asbestos dated May 19, 1971; addressed to S.D. Goodman, Chief, Minerals & Ore Div., Property Management & Disposal Service, GSA; to be shipped to Keene Corp., Ceiling & Insulation Div., Valley Forge, PA. (2 pages)

ANSWER TO INTERROGATORY NUMBER 1x: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(y) KN 137 Keene Corp. Blanket Purchase Order for amosite asbestos dated Sept. 1971; addressed to S.D. Goodman, Chief, Minerals & Ore Div., Property Management & Disposal Service, GSA; to be shipped to Keene Corp., Ceiling & Insulation Div., Valley Forge, PA. (1 page)

ANSWER TO INTERROGATORY NUMBER 1y: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(z) KN 138 Keene Corp. Memo dated Oct. 8, 1971, to Messr. R. Griggs from Anthony Cuccchiaro re John-Manville's invoice no. EA-3631 enclosing: Canadian Johns-

Manville Asbestos Ltd. letter dated Oct. 1, 1971, to KN Corp., attn. Mr. Cucchiaro, from L.R. Delaney re "Your Order I-6270" and "Our Invoice A10-EA-3631"; revised diagram; and, Asbestos & Danville Railway Daily Weight Sheet. (4 pages)

ANSWER TO INTERROGATORY NUMBER 1z: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(aa) KN 139 Letter dated April 24, 1972, to Certain-Ted Products Corp., attn. J.V. Kotarski, from F.L. Schawo, Mrg. Spray Products. (1 page)

ANSWER TO INTERROGATORY NUMBER aa: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(bb) KN 140 Certificate of Incorporation of Keene Corporation signed by incorporators on April 5, 1967, received and filed by the Secretary of State of the State of Delaware on April 7, 1967. (17 pages)

ANSWER TO INTERROGATORY NUMBER bb: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(cc) KN 141 Letter dated Jan. 31, 1968 to Keene Corp. from Baldwin-Ehret-Hill regarding the Stock Purchase Agreement. (3 Pages)

ANSWER TO INTERROGATORY NUMBER cc: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(dd) KN 142 Stock Purchase Agreement dated Feb. 1, 1968, by and between Keene Corp. and the stockholders of Baldwin-Ehret-Hill with attached Exhibits A and B. (31 pages)

ANSWER TO INTERROGATORY NUMBER dd: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(ee) KN 143 Letter dated Feb. 1, 1968, to Keene Corp. from Ballard, Spahr, Andrews & Ingersoll re Baldwin-Ehret-Hill. (2 pages)

ANSWER TO INTERROGATORY NUMBER ee: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(ff) KN 144 Keene Corp. Invitation for Tenders of Common Stock of Baldwin-Ehret-Hill, Inc. dated Feb. 2, 1968, to the Holders of Common Stock of Baldwin-Ehret-Hill, Inc., signed by Glenn W. Bailey with attached form letter of transmittal for tenders of common stock of Baldwin-Ehret-Hill, Inc. and instructions. (3 pages)

ANSWER TO INTERROGATORY NUMBER ff: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(gg) KN 145 Letter dated Feb. 5, 1968, to the stockholders of Baldwin-Ehret-Hill, Inc. from Alvin Ehret, Chairman of the Board, and E.R. Stevens, Pres. (1 page)

ANSWER TO INTERROGATORY NUMBER gg: Keene states that the referenced exhibit appears to be a copy of a document from Keene's

document depository.

(hh) KN 146 Letter dated Aug. 8, 1969, to United States Corp. Co. from John Groome, Fir. of the Corp. Bureau for the Commonwealth of Pa, certifying that the Articles of Incorporation for K.B.E.H. Corp. Articles of Incorporation signed July 18, 1969, are attached. (3 pages)

ANSWER TO INTERROGATORY NUMBER hh: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(ii) KN 147 Articles of Merger of K.B.E.H. Corporation Into Baldwin-Ehret-Hill, Inc. signed Aug. 26 1969; Appendix A-Joint Plan of Merger - K.B.E.H. Corporation into Baldwin-Ehret-Hill, Inc. filed Aug. 28, 1969; and, Commonwealth of Pennsylvania Certificate of Merger of K.B.E.H. Corp. into and with Baldwin-Ehret-Hill, Inc., the surviving corp., dated Aug. 28, 1969. (10 pages)

ANSWER TO INTERROGATORY NUMBER ii: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(jj) KN 148 Certificate of Incorporation of the Keene Building Products Corporation received and filed by the state of Delaware Dec. 18, 1969. (5 pages)

ANSWER TO INTERROGATORY NUMBER jj: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(kk) KN 149 Agreement and Articles of Merger of Baldwin-Ehret-Hill, Inc. Into Keene Building Products corp.

signed Dec. 29, 1969 with attachments: . Appendix A - Joint Plan of Merger of Baldwin-Ehret-Hill, Inc. into Keene Building Products Corp.; Certificate of Agreement of Merger of BEH into KBPC from the State of Delaware dated Jan. 27, 1970; Certificate of Merger of BEH into KBPC from the Commonwealth of PA dated Jan. 27, 1970. (14 pages)

ANSWER TO INTERROGATORY NUMBER kk: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(ll) KN 150 Resolutions of the Board of Directors of the Keene Corp. regarding the transfer of assets and liabilities from KBPC to Keene Corp. as reported in the Minutes of their meeting held on Sept. 20, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER ll: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(mm) KN 151 Resolutions of the Board of Directors of the Keene Corp. regarding the sale of common stock of KBPC as reported in the Minutes of their meeting held on Sept. 20, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER mm: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(nn) KN 152 Consent of sole Shareholder of KBPC Corp. to the adoption of resolutions regarding the transfer of assets and liabilities from KBPC to Keene, dated Oct. 8, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER nn: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(oo) KN 153 KBPC Consent of Directors to the adoption of resolutions regarding the transfer of assets and liabilities from KBPC to Keene, dated Oct. 8, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER oo: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

(pp) KN 154 Stock Purchase Agreement dated Oct. 9, 1974, between Keene Corp. and Building Products Corp. with attachments: Exhibits A through H. (37 pages)

ANSWER TO INTERROGATORY NUMBER pp: Keene states that the referenced exhibit appears to be a copy of a document from Keene's document depository.

2. For each document listed below, please answer whether such document was kept and/or generated in the regular course of a regularly conducted business activity of any Keene Entity by an employee or representative of any Keene Entity with knowledge of the act, event, condition or opinion recorded.

(a) KN 113 Two Medical articles: "Asbestos Dust Called a Hazard to at least one-fourth of U.S.," The New York Times, March 2, 1966; "MDs Study Effects of Asbestos Dust, : N.Y. World-Telegram, March 2, 1966. (1 page)

ANSWER TO INTERROGATORY NUMBER 2a: Keene states see answer to interrogatory No. 1.

(b) KN 114 Letter dated June 6, 1966, to John Boyer from J.P. Verhalen with enclosure: Letter dated June 3, 1966, to Alton Evans from John O'Rourke. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2b: Keene states see answer to interrogatory No. 1.

(c) KN 115 Draft of the Minutes of the Spring Meeting of the Sprayed Mineral Fiber Manufacturers Association, Inc. dated June 17, 1966. (4 pages)

ANSWER TO INTERROGATORY NUMBER 2c: Keene states see answer to interrogatory No. 1.

(d) KN 116 Letter dated Aug. 22, 1966, to M. Lieff, H. Wilson, and F. Stumpf, with c.t. to Verhalen and Boyer, from H.L. Levine. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2d: Keene states see answer to interrogatory No. 1.

(e) KN 117 Letter dated Sept. 29, 1966, to Business Representatives, Affiliated Local Unions and Craft Councils from J.A. Cinquemanni, Executive Sec. of the L.A. Bldg. & Constr. Trades Council. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2e: Keene states see answer to interrogatory No. 1.

(f) KN 118 Letter dated Dec. 15, 1966, to J.P. Verhalen from F.M. Stumph re Dust Tests. (1 page)

ANSWER TO INTERROGATORY NUMBER 2f: Keene states see answer to interrogatory No. 1.

(g) KN 119 Dust Collection Data from tests conducted on USMP, BEH, S&K, and Asbestospray products. Spray Date: Jan. 12, 1967, Integrity and Density: Jan. 18, 1967, signed S.D. Sumski. (3 pages)

ANSWER TO INTERROGATORY NUMBER 2g: Keene states see answer to interrogatory No. 1.

(h) KN 120 Report of Enviromental Health Study from William R. Bradley to the Sprayed Mineral Fiber Manufacturers Association, Inc.; attention: Technical Committee; dated Jan. 23, 1967. (6 pages)

ANSWER TO INTERROGATORY NUMBER 2h: Keene states see answer to interrogatory No. 1.

(i) KN 121 Letter dated Feb. 10, 1967, to James Verhalen from John Boyer with enclosure: Letter to James Verhalen, Pres. of the SMFMA< from George Sherman, Chief of the Div. of Industrial Safety of CA dated Feb. 7, 1967. (3 pages)

ANSWER TO INTERROGATORY NUMBER 2i: Keene states see answer to interrogatory No. 1.

(j) KN 122 Letter dated March 13, 1967, to Wittkop, Verhalen, Binger, Levine and Boyer of the SMFMA for Frank Stumpf enclosing copies of a report on sprayed fiber air sampling tests conducted for the SMFMA on March 1, 1967, by William R. Bradley. (5 pages)

ANSWER TO INTERROGATORY NUMBER 2j: Keene states see answer to interrogatory No. 1.

(k) KN 123 Two page report of enviromental health study of an operator spraying products dated June 16, 1967 from William R. Bradley to Dr. M. Lieff. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2k: Keene states see answer to interrogatory No. 1.

(l) KN 124 Letter dated Sept. 6, 1967, to Binger and others of the SMFMA from R. H., toth, Chairman of the Promotional Comm. of the SMFMA, enclosing a newspaper article: "Widow Sues, Says Asbestos Caused Husband's Death, "The Daily Home News, New Brunswick, N.J., Aug. 1967. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2l: Keene states see answer to interrogatory No. 1.

(m) KN 125 Letter dated June 6, 1968, to District Sales Mgrs. --SCSD- and Pyrospray Manual Holders from Lee Jeene, B-E-H Mgr. of Spray Products, with two enclosures: flyer sheet from B-E-H Pyrospray Brochure and article entitled "fireproofing Pumped Up 40 Stories, " reprinted from Engineering News record. (3 pages)

ANSWER TO INTERROGATORY NUMBER 2m: Keene states see answer to interrogatory No. 1.

(n) KN 126 Letter dated June 28, 1968, to Wittkop, Toth, and O'Rourke with c.t. to Binger from H.L. Levine of the SMFMA. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2n: Keene states see answer to interrogatory No. 1.

(o) KN 127 Confidential Conference Report dated Fed. 28, 1969, of a meeting held on Feb. 25, 1969, at MJA between Keene and the agency. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2o: Keene states see

answer to interrogatory No. 1.

(p) KN 128 Keene Corp. Mfg. Div. report from James I. Saylor dated July 19, 1969, presenting results of dust samples taken in the Batch Dept. and the Cutting Dept, in Valley Forge PA. (4 pages)

ANSWER TO INTERROGATORY NUMBER 2p: Keene states see answer to interrogatory No. 1.

(q) KN 129 Invoice Nos. ZM 57248 & 57152 dated Oct. 14, 1969, from Johns-Manville Products Corp. for insulation materials sent to Keene Corp. (3 pages)

ANSWER TO INTERROGATORY NUMBER 2q: Keene states see answer to interrogatory No. 1.

(r) KN 130 Keene Corp. Industrial Insulation Div. Requisition Order No. 15689 dated June 3, 1970, to Johns-Manville for bags of asbestos. (1 page)

ANSWER TO INTERROGATORY NUMBER 2r: Keene states see answer to interrogatory No. 1.

(s) KN 131 Memo dated OC. 8, 1979, to D. Kaplan, Valley Forge Plant, form Anthony Cucchiaro, Mgr. of Distribution for the Industrial Insulation Div. (1 pages)

ANSWER TO INTERROGATORY NUMBER 2s: Keene states see answer to interrogatory No. 1.

(t) KN 132 Internal Correspondence dated Oct. 16, 1970, to Boris Stern form A.P. Mueller re Spraycraft, Linden Plant. (10 pages)

ANSWER TO INTERROGATORY NUMBER 2t: Keene states see answer to interrogatory No. 1.

(u) KN 133 Letter dated Oct. 22, 1970, to A.R. Cucchiaro, Mgr. of Distribution KN Corp. Industrial Insulation Div., from J.E. Connor, Asbestos Fibre Div. of Johns-Manville, enclosing copies of data sheets on asbestos fibre grades and rail rates from Canadian J-M Asbestos Fibre Div. (6 pages)

ANSWER TO INTERROGATORY NUMBER 2u: Keene states see answer to interrogatory No. 1.

(v) KN 134 Keene Corp. Industrial Insulation Div. Memo dated Nov. 2, 1970, to Dr. M. L. Pearce from Anthony R. Cucchiaro re Asbestos-South African. (1 page)

ANSWER TO INTERROGATORY NUMBER 2v: Keene states see answer to interrogatory No. 1.

(w) KN 135 Letter dated Nov. 30, 1970, to A. Cucchiaro of Keene Corp. from Joan Holtze of North American Asbestos Corp. enclosing the purchase agreement for the sale of asbestos fibre between NAAC and KN. (4 pages)

ANSWER TO INTERROGATORY NUMBER 2w: Keene states see answer to interrogatory No. 1.

(x) KN 136 Keene Corp. Purchase Order for amosite asbestos dated May 19, 1971; addressed to S.D. Goodman, Chief, Minerals & Ore Div., Property Management & Disposal Service, GSA; to be shipped to Keene Corp., Ceiling & Insulation Div., Valley Forge, PA. (2 pages)

ANSWER TO INTERROGATORY NUMBER No. 2x: Keene states see answer to interrogatory No. 1.

(y) KN 137 Keene Corp. Blanket Purchase Order for amosite asbestos dated Sept. 1971; addressed to S.D. Goodman, Chief, Minerals & Ore Div., Property Management & Disposal Service, GSA; to be shipped to Keene Corp., Ceiling & Insulation Div., Valley Forge, PA. (1 page)

ANSWER TO INTERROGATORY NUMBER 2y: Keene states see answer to interrogatory No. 1.

(z) KN 138 Keene Corp. Memo dated Oct. 8, 1971, to Messr. R. Griggs form Anthony Cucchiaro re John-Manville's invoice no. EA-3631 enclosing: Canadian Johns-Manville Asbestos LTD. letter dated Oct. 1, 1971, to KN Corp., attn. Mr. Cucchiaro, from L.R. Delaney re "Your Order I-6270" and "Our Invoice A10-EA-3631"; revised diagram; and, Asbestos & Danville Railway Daily Weight Sheet. (4 pages)

ANSWER TO INTERROGATORY NUMBER 2z: Keene states see answer to interrogatory No. 1.

(aa) KN 139 Letter dated April 24, 1972, to Certain-Teed Products Corp., attn. J.V. Kotarski, form F.L. Schawo, Mgr. Spray Products. (1 page)

ANSWER TO INTERROGATORY NUMBER 2aa: Keene states see answer to interrogatory No. 1.

(bb) KN 140 Certificate of Incorporation of Keene Corporation signed by incorporators on April 5, 1967, received and filed by the Secretary of State of the State Delaware on April 7, 1967. (17 pages)

ANSWER TO INTERROGATORY NUMBER 2bb: Keene states see answer to interrogatory No. 1.

(cc) KN 141 Letter dated Jan 31, 1968, to Keene Corp. from Baldwin-Ehret-Hill regarding the Stock Purchase Agreement. (3 pages)

ANSWER TO INTERROGATORY NUMBER 2cc: Keene states see answer to interrogatory No. 1.

(dd) KN 142 Stock Purchase Agreement dated Feb. 1, 1968, by and between Keene Corp. and the stockholders of Baldwin-Ehret-Hill with attached Exhibits A and B (31 pages)

ANSWER TO INTERROGATORY NUMBER 2dd: Keene states see answer to interrogatory No. 1.

(ee) KN 143 Letter dated Feb. 1, 1968, to Keene Corp. form Ballard, Spahr, Andrews & Ingersoll re Baldwin-Ehret-Hill. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2ee: Keene states see answer to interrogatory No. 1.

(ff) KN 144 Keene Corp. Invitation for Tenders of Common Stock of Baldwin-Ehret-Hill, Inc. dated Feb. 2, 1968, to the Holders of Common Stock of Baldwin-Ehret-Hill, Inc., signed by Glenn W. Bailey with attached form letter of transmittal for tenders to common stock of Baldwin-Ehret-Hill, Inc, and instructions. (3 pages)

ANSWER TO INTERROGATORY NUMBER 2ff: Keene states see answer to interrogatory No. 1.

(gg) KN 145 Letter dated Feb. 5, 1968, to the stockholders of Baldwin-Ehret-Hill, Inc. from Alvin Ehret, Chairman of the Board, and E.R. Stevens, Pres. (1 page)

ANSWER TO INTERROGATORY NUMBER 2gg: Keene states see answer to interrogatory No. 1.

(hh) KN 146 Letter dated Aug. 8, 1969, to United States Corp. Co. from John Groome, Dir. of the Corp. Bureau for the Commonwealth of PA, certifying that the Articles of Incorporation for K.B.E.H. Corp. were approved and filed Aug. 1, 1969. K.B.E.H. Corp. Articles of Incorporation signed July 18, 1969, are attached. (3 pages)

ANSWER TO INTERROGATORY NUMBER 2hh: Keene states see answer to interrogatory No. 1.

(ii) KN 147 Articles of Merger of K.B.E.H. Corporation Into Baldwin-Ehret-Hill, Inc. signed Aug. 26, 1969; Appendix A-Joint Plan of Merger - K.B.E.H. Corporation into Baldwin-Ehret-Hill, Inc. filed Aug. 28, 1969; and, Commonwealth of Pennsylvania Certificate of Merger of K.B.E.H. Corp. into and with Baldwin-Ehret-Hill, Inc., the surviving corp., dated Aug. 28, 1969. (10 pages)

ANSWER TO INTERROGATORY NUMBER 2ii: Keene states see answer to interrogatory No. 1.

(jj) KN 148 Certificate of Incorporation of the Keene Building Products Corporation received and filed by the state of Delaware Dec. 18 1969. (5 pages)

ANSWER TO INTERROGATORY NUMBER 2jj: Keene states see answer to interrogatory No. 1.

(kk) KN 149 Agreement and Articles of Merger Baldwin-Ehret-Hill, Inc. Into Keene building Products Corp. signed Dec. 29, 1969 with attachments: Appendix A -Joint Plan of Merger of Baldwin-Ehret-Hill, Inc. into Keene Building Products Corp.; Certificate of Agreement

of Merger of BEH into KBPC from the Commonwealth of PA dated Jan. 27, 1970. (14 pages)

ANSWER TO INTERROGATORY NUMBER 2kk: Keene states see answer to interrogatory No. 1.

(ll) KN 150 Resolutions of the Board of Directors of the Keene Corp. regarding the transfer of assets and liabilities form KBPC to Keene Corp. as reported in the Minutes of their meeting held on Sept. 20, 1974. (4 pages)

ANSWER TO INTERROGATORY NUMBER 2ll: Keene states see answer to interrogatory No. 1.

(mm) KN 151 Resolutions of the Board of Directors of the Keene corp. regarding the sale of common stock of KBPC as reported in the Minutes of their meeting held on Sept. 20, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2mm: Keene states see answer to interrogatory No. 1.

(nn) KN 152 Consent of Sole Shareholder of KBPC Corp. to the adoption of resolutions regarding the transfer of assets and liabilities from KBPC to Keene, dated Oct. 8, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2nn: Keene states see answer to interrogatory No. 1.

(oo) KN 153 KBPC Consent of Directors to the adoption of resolutions regarding the transfer of assets and liabilities from KBPC to Keene, dated Oct. 8, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER 2oo: Keene states see answer to interrogatory No. 1.

(pp) KN 154 Stock Purchase Agreement dated Oct. 9, 1974, between Keene Corp. and Building Products Corp. with attachments: Exhibits A through H. (37 pages)

ANSWER TO INTERROGATORY NUMBER 2pp: Keene states see answer to interrogatory No. 1.

3. For each document listed below, please answer whether such document was found in your files in such a conditional to create no suspicion concerning its authenticity.

(a) KN 113 Two Medical articles: "Asbestos Dust Called a Hazard to at least one-fourth of U.S.," The New York Times, March 2, 1966; "MDs Study Effects of Asbestos Dust, : N.Y. World-Telegram, March 2, 1966. (1 page)

ANSWER TO INTERROGATORY NUMBER 3a: Keene states see answer to interrogatory No. 1.

(b) KN 114 Letter dated June 6, 1966, to John Boyer from J.P. Verhalen with enclosure: Letter dated June 3, 1966, to Alton Evans from John O'Rourke. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3b: Keene states see answer to interrogatory No. 1.

(c) KN 115 Draft of the Minutes of the Spring Meeting of the Sprayed Mineral Fiber Manufacturers Association, Inc. dated June 17, 1966. (4 pages)

ANSWER TO INTERROGATORY NUMBER 3c: Keene states see answer to interrogatory No. 1.

(d) KN 116 Letter dated Aug. 22, 1966, to M. Lieff, H. Wilson, and F. Stumpf, with c.t. to Verhalen and Boyer, from H.L. Levine. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3d: Keene states see answer to interrogatory No. 1.

(e) KN 117 Letter dated Sept. 29, 1966, to Business Representatives, Affiliated Local Unions and Craft Councils from J.A. Cinquemanni, Executive Sec. of the L.A. Bldg. & Constr. Trades Council. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3e: Keene states see answer to interrogatory No. 1.

(f) KN 118 Letter dated Dec. 15, 1966, to J.P. Verhalen from F.M. Stumph re Dust Tests. (1 page)

ANSWER TO INTERROGATORY NUMBER 3f: Keene states see answer to interrogatory No. 1.

(g) KN 119 Dust Collection Data from tests conducted on USMP, BEH, S&K, and Asbestospray products. Spray Date: Jan. 12, 1967, Integrity and Density: Jan. 18, 1967, signed S.D. Sumski. (3 pages)

ANSWER TO INTERROGATORY NUMBER 3g: Keene states see answer to interrogatory No. 1.

(h) KN 120 Report of Enviromental Health Study from William R. Bradley to the Sprayed Mineral Fiber Manufacturers Association, Inc.; attention: Technical Committee; dated Jan. 23, 1967. (6 pages)

ANSWER TO INTERROGATORY NUMBER 3h: Keene states see

answer to interrogatory No. 1.

(i) KN 121 Letter dated Feb. 10, 1967, to James Verhalen from John Boyer with enclosure: Letter to James Verhalen, Pres. of the SMFMA< from George Sherman, Chief of the Div. of Industrial Safety of CA dated Feb. 7, 1967. (3 pages)

ANSWER TO INTERROGATORY NUMBER 3i: Keene states see answer to interrogatory No. 1.

(j) KN 122 Letter dated March 13, 1967, to Wittkop, Verhalen, Binger, Levine and Boyer of the SMFMA for Frank Stumpf enclosing copies of a report on sprayed fiber air sampling tests conducted for the SMFMA on March 1, 1967, by William R. Bradley. (5 pages)

ANSWER TO INTERROGATORY NUMBER 3j: Keene states see answer to interrogatory No. 1.

(k) KN 123 Two page report of enviromental health study of an operator spraying products dated June 16, 1967 from William R. Bradley to Dr. M. Lieff. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3k: Keene states see answer to interrogatory No. 1.

(l) KN 124 Letter dated Sept. 6, 1967, to Binger and others of the SMFMA from R. H., toth, Chairman of the Promotional Comm. of the SMFMA, enclosing a newspaper article: "Widow Sues, Says Asbestos Caused Husband's Death, "The Daily Home News, New Brunswick, N.J., Aug. 1967. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3l: Keene states see answer to interrogatory No. 1.

(m) KN 125 Letter dated June 6, 1968, to District Sales Mgrs. --SCSD- and Pyrospray Manual Holders from Lee Jeene, B-E-H Mgr. of Spray Products, with two enclosures: flyer sheet from B-E-H Pyrospray Brochure and article entitled "fireproofing Pumped Up 40 Stories, " reprinted from Engineering News record. (3 pages)

ANSWER TO INTERROGATORY NUMBER 3m: Keene states see answer to interrogatory No. 1.

(n) KN 126 Letter dated June 28, 1968, to Wittkop, Toth, and O'Rourke with c.t. to Binger from H.L. Levine of the SMFMA. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3n: Keene states see answer to interrogatory No. 1.

(o) KN 127 Confidential Conference Report dated Fed. 28, 1969, of a meeting held on Feb. 25, 1969, at MJA between Keene and the agency. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3o: Keene states see answer to interrogatory No. 1.

(p) KN 128 Keene Corp. Mfg. Div. report from James I. Saylor dated July 19, 1969, presenting results of dust samples taken in the Batch Dept. and the Cutting Dept, in Valley Forge PA. (4 pages)

ANSWER TO INTERROGATORY NUMBER 3p: Keene states see answer to interrogatory No. 1.

(q) KN 129 Invoice Nos. ZM 57248 & 57152 dated Oct. 14, 1969, from Johns-Manville Products Corp. for insulation materials sent to Keene Corp. (3 pages)

ANSWER TO INTERROGATORY NUMBER 3q: Keene states see answer to interrogatory No. 1.

(r) KN 130 Keene Corp. Industrial Insulation Div. Requisition Order No. 15689 dated June 3, 1970, to Johns-Manville for bags of asbestos. (1 page)

ANSWER TO INTERROGATORY NUMBER 3r: Keene states see answer to interrogatory No. 1.

(s) KN 131 Memo dated OC. 8, 1979, to D. Kaplan, Valley Forge Plant, form Anthony Cucchiaro, Mgr. of Distribution for the Industrial Insulation Div. (1 pages)

ANSWER TO INTERROGATORY NUMBER 3s: Keene states see answer to interrogatory No. 1.

(t) KN 132 Internal Correspondence dated Oct. 16, 1970, to Boris Stern form A.P. Mueller re Spraycraft, Linden Plant. (10 pages)

ANSWER TO INTERROGATORY NUMBER 3t: Keene states see answer to interrogatory No. 1.

(u) KN 133 Letter dated Oct. 22, 1970, to A.R. Cucchiaro, Mgr. of Distribution KN Corp. Industrial Insulation Div., from J.E. Connor, Asbestos Fibre Div. of Johns-Manville, enclosing copies of data sheets or asbestos fibre grades and rail rates from Canadiar J-M Asbestos Fibre Div. (6 pages)

ANSWER TO INTERROGATORY NUMBER 3u: Keene states see answer to interrogatory No. 1.

(v) KN 134 Keene Corp. Industrial Insulation Div. Memo datec Nov. 2, 1970, to Dr. M. L. Pearce from Anthony R.

Cucchiaro re Asbestos-South African. (1 page)

ANSWER TO INTERROGATORY NUMBER 3v: Keene states see answer to interrogatory No. 1.

(w) KN 135 Letter dated Nov. 30, 1970, to A. Cucchiaro of Keene Corp. from Joan Holtze of North American Asbestos Corp. enclosing the purchase agreement for the sale of asbestos fibre between NAAC and KN. (4 pages)

ANSWER TO INTERROGATORY NUMBER 3w: Keene states see answer to interrogatory No. 1.

(x) KN 136 Keene Corp. Purchase Order for amosite asbestos dated May 19, 1971; addressed to S.D. Goodman, Chief, Minerals & Ore Div., Property Management & Disposal Service, GSA; to be shipped to Keene Corp., Ceiling & Insulation Div., Valley Forge, PA. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3x: Keene states see answer to interrogatory No. 1.

(y) KN 137 Keene Corp. Blanket Purchase Order for amosite asbestos dated Sept. 1971; addressed to S.D. Goodman, Chief, Minerals & Ore Div., Property Management & Disposal Service, GSA; to be shipped to Keene Corp., Ceiling & Insulation Div., Valley Forge, PA. (1 page)

ANSWER TO INTERROGATORY NUMBER 3y: Keene states see answer to interrogatory No. 1.

(z) KN 138 Keene Corp. Memo dated Oct. 8, 1971, to Messr. R. Griggs form Anthony Cucchiaro re John-Manville's invoice no. EA-3631 enclosing: Canadian Johns-Manville Asbestos LTD. letter dated Oct. 1, 1971,

to KN Corp., attn. Mr. Cucchiaro, from L.R. Delaney re "Your Order I-6270" and "Our Invoice A10-EA-3631"; revised diagram; and, Asbestos & Danville Railway Daily Weight Sheet. (4 pages)

ANSWER TO INTERROGATORY NUMBER 3z: Keene states see answer to interrogatory No. 1.

(aa) KN 139 Letter dated April 24, 1972, to Certain-Teed Products Corp., attn. J.V. Kotarski, form F.L. Schawo, Mgr. Spray Products. (1 page)

ANSWER TO INTERROGATORY NUMBER 3aa: Keene states see answer to interrogatory No. 1.

(bb) KN 140 Certificate of Incorporation of Keene Corporation signed by incorporators on April 5, 1967, received and filed by the Secretary of State of the State of Delaware on April 7, 1967. (17 pages)

ANSWER TO INTERROGATORY NUMBER 3bb: Keene states see answer to interrogatory No. 1.

(cc) KN 141 Letter dated Jan 31, 1968, to Keene Corp. from Baldwin-Ehret-Hill regarding the Stock Purchase Agreement. (3 pages)

ANSWER TO INTERROGATORY NUMBER 3cc: Keene states see answer to interrogatory No. 1.

(dd) KN 142 Stock Purchase Agreement dated Feb. 1, 1968, by and between Keene Corp. and the stockholders of Baldwin-Ehret-Hill with attached Exhibits A and B (31 pages)

ANSWER TO INTERROGATORY NUMBER 3dd: Keene states see

answer to interrogatory No. 1.

(ee) KN 143 Letter dated Feb. 1, 1968, to Keene Corp. form Ballard, Spahr, Andrews & Ingersoll re Baldwin-Ehret-Hill. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3ee: Keene states see answer to interrogatory No. 1.

(ff) KN 144 Keene Corp. Invitation for Tenders of Common Stock of Baldwin-Ehret-Hill, Inc. dated Feb. 2, 1968, to the Holders of Common Stock of Baldwin-Ehret-Hill, Inc., signed by Glenn W. Bailey with attached form letter of transmittal for tenders to common stock of Baldwin-Ehret-Hill, Inc, and instructions. (3 pages)

ANSWER TO INTERROGATORY NUMBER 3ff: Keene states see answer to interrogatory No. 1.

(gg) KN 145 Letter dated Feb. 5, 1968, to the stockholders of Baldwin-Ehret-Hill, Inc. from Alvin Ehret, Chairmar of the Board, and E.R. Stevens, Pres. (1 page)

ANSWER TO INTERROGATORY NUMBER 3gg: Keene states see answer to interrogatory No. 1.

(hh) KN 146 Letter dated Aug. 8, 1969, to United States Corp. Co. from John Groome, Dir. of the Corp. Bureau for the Commonwealth of PA, certifying that the Articles of Incorporation for K.B.E.H. Corp. were approved and filed Aug. 1, 1969. K.B.E.H. Corp. Articles of Incorporation signed July 18, 1969, are attached. (3 pages)

ANSWER TO INTERROGATORY NUMBER 3hh: Keene states see answer to interrogatory No. 1.

(ii) KN 147 Articles of Merger of K.B.E.H. Corporation Into Baldwin-Ehret-Hill, Inc. signed Aug. 26, 1969; Appendix A-Joint Plan of Merger - K.B.E.H. Corporation into Baldwin-Ehret-Hill, Inc. filed Aug. 28, 1969; and, Commonwealth of Pennsylvania Certificate of Merger of K.B.E.H. Corp. into and with Baldwin-Ehret-Hill, Inc., the surviving corp., dated Aug. 28, 1969. (10 pages)

ANSWER TO INTERROGATORY NUMBER 3ii: Keene states see answer to interrogatory No. 1.

(jj) KN 148 Certificate of Incorporation of the Keene Building Products Corporation received and filed by the state of Delaware Dec. 18 1969. (5 pages)

ANSWER TO INTERROGATORY NUMBER 3jj: Keene states see answer to interrogatory No. 1.

(kk) KN 149 Agreement and Articles of Merger Baldwin-Ehret-Hill, Inc. Into Keene building Products Corp. signed Dec. 29, 1969 with attachments: Appendix A -Joint Plan of Merger of Baldwin-Ehret-Hill, Inc. into Keene Building Products Corp.; Certificate of Agreement of Merger of BEH into KBPC from the Commonwealth of PA dated Jan. 27, 1970. (14 pages)

ANSWER TO INTERROGATORY NUMBER 3kk: Keene states see answer to interrogatory No. 1.

(ll) KN 150 Resolutions of the Board of Directors of the Keene Corp. regarding the transfer of assets and liabilities form KBPC to Keene Corp. as reported in the Minutes of their meeting held on Sept. 20, 1974. (4 pages)

ANSWER TO INTERROGATORY NUMBER 3ll: Keene states see answer to interrogatory No. 1.

(mm) KN 151 Resolutions of the Board of Directors of the Keene corp. regarding the sale of common stock of KBPC as reported in the Minutes of their meeting held on Sept. 20, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3mm: Keene states see answer to interrogatory No. 1.

(nn) KN 152 Consent of Sole Shareholder of KBPC Corp. to the adoption of resolutions regarding the transfer of assets and liabilities from KBPC to Keene, dated Oct. 8, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3nn: Keene states see answer to interrogatory No. 1.

(oo) KN 153 KBPC Consent of Directors to the adoption of resolutions regarding the transfer of assets and liabilities from KBPC to Keene, dated Oct. 8, 1974. (2 pages)

ANSWER TO INTERROGATORY NUMBER 3oo: Keene states see answer to interrogatory No. 1.

(pp) KN 154 Stock Purchase Agreement dated Oct. 9, 1974, between Keene Corp. and Building Products Corp. with attachments: Exhibits A through H. (37 pages)

ANSWER TO INTERROGATORY NUMBER 3pp: Keene states see answer to interrogatory No. 1.

4. Has Keene Corporation stipulated or agreed to the authenticity of any of the documents referenced in Interrogatory No. 1 with any person prior to the date of these Interrogatories?

If so, please (a) identify the person(s) with whom this stipulation or agreement was reached, (b) the date(s) of said stipulation or

agreement, and(c) identify the documents.

ANSWER TO INTERROGATORY NUMBER 4: Keene objects to this interrogatory on the grounds that it seeks information which is not relevant or is not likely to lead to the discovery of admissible evidence. Keene objects to this interrogatory as being unduly burdensome, harassing, or oppressive. Keene objects to this interrogatory on the grounds that it is overly broad as to time, scope, or location.

STATE OF NEW YORK)
: ss.:
COUNTY OF NEW YORK)

JOHN G. O'BRIEN being duly sworn, deposes and says that he is Associate General Counsel and Assistant Secretary of Keene Corporation. The foregoing is verified on behalf of Keene Corporation. The matters stated therein are not within his personal knowledge and have been prepared pursuant to his directions from information and records available to said corporation. He believes the foregoing to be true.

John G. O'Brien

Sworn to before me this
13 day of September 1991

Notary Public

Notary Public, State of New York
No. 24-4871036
Qualified in Kings County
Commission Expires Sept. 06, 19 92