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PLAINTIFF'S
EXHIBIT
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA DEC 10 1981
Wilmington Division

J. RICH LEONARD, CLERK
U. S. DISTRICT COURT,
E. DIST. NO. CAR.

RAYMOND L. BALLARD,)
)
Plaintiff,)
)
VS.)
)
UNARCO, INC., ET AL,)
)
Defendants.)

REQUEST FOR ADMISSION OF FACTS
AND GENUINENESS OF DOCUMENTS

TO: Raybestos-Manhattan, Inc.:

You are requested to admit for the purpose of this
action only the following within 20 days after service
hereof:

1. The genuineness of the following documents:

a. The documents labeled as plaintiffs' trial
exhibits 617-655, 658-684, 686-687, 690, 701-714, 712-722,
and 725-732 (and further described in the attached list),
which are maintained at the law offices of Blatt and Fales,
Barnwell, South Carolina, and which were exhibited to national
co-ordinating counsel for defendant at the taking of the
deposition of John H. Marsh for cases pending in the United
States District Court for the Southern District of Georgia,
Savannah Division, and the Court of Common Pleas, State of
South Carolina, County of Barnwell.

b. The document labeled defendant's exhibit 100
(which is plaintiff's exhibit 803) to the March 30, 1981,
deposition of Mr. John Marsh, which is an unpublished article
entitled "Environmental Realities", as described in the
attached list and a copy of which is attached hereto.

c. The documents numbered 804-807 on the attached
list, copies of which are attached hereto and which were

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WV-011948

also attached as exhibits to the deposition of John Marsh taken in the case of Dorothy St. Jacque v. Johns-Manville Products Corporation, No. C-137-465, on January 21, 1980.

2. That each of the documents described herein are authentic copies of documents and records which were contained in the files of Mr. John Marsh, Director of Environmental Affairs, for the defendants, Raybestos-Manhattan, Inc., that the documents and records described herein were regularly kept in the ordinary course of business by John Marsh, Director of Environmental Affairs, of the defendants, Raybestos-Manhattan, Inc., and that the entries in said documents and records were made at or near the time of the transaction or event recorded.

This the 10th day of December, 1981.

MURCHISON, FOX & NEWTON

BY:

Frank B. Gibson, Jr.
Frank B. Gibson, Jr.
Attorneys for Plaintiff
16 N. 5th Ave.
Wilmington, NC 28401
(919) 763-2426

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing
Request for Admission of Facts and Geniuneness
of Documents was this

day served upon the below-named counsel by mailing postage prepaid,
first class mail, of a copy of each of such instruments to such
counsel at the address shown below:

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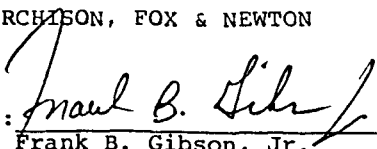
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Atlanta, Ga. 30316

Mr. John F. Crossley
Crossley & Johnson
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This 10th day of December, 19 81.

MURCHISON, FOX & NEWTON

BY:



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