



GARRUTO, GALEX & CANTOR, ESQS.
160 Tices Lane
East Brunswick, New Jersey 0816
(201) 214-1600
ATTORNEYS FOR PLAINTIFF

PLAINTIFF

JOSEPH WALTERS, and
EDNA, his wife,

VS

DEFENDANTS

ARMSTRONG WORLD INDUSTRIES,
INC. ET AL.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-PASSAIC COUNTY
DOCKET NO. L-2530-90

Civil Action
Asbestos Litigation

PLAINTIFF

STEVIE WILLIAMSON,
individually and as Admin-
istratrix and Administratrix
ad Prosequendum of the Estate
of ALFONSO WILLIAMSON,

VS

DEFENDANT

ARMSTRONG WORLD INDUSTRIES,
INC. ET AL.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-MIDDLESEX COUNTY
DOCKET NO. L-9064-90

Civil Action
Asbestos Litigation

PLAINTIFF

STANLEY ROMANEK, ET AL

VS

DEFENDANT

ARMSTRONG WORLD INDUSTRIES,
INC. ET AL.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-MIDDLESEX COUNTY
DOCKET NO. L-000714-90

Civil Action
Asbestos Litigation

GARRUTO GALEX & CANTOR

PLAINTIFF

ALFRED KANEWSKI, ET AL

VS

DEFENDANT

ARMSTRONG WORLD INDUSTRIES, INC. ET AL.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-MIDDLESEX COUNTY
DOCKET NO. L-2156-90

Civil Action
Asbestos Litigation

PLAINTIFF

CASEY FRIAR, ET AL

VS

DEFENDANT

ARMSTRONG WORLD INDUSTRIES, INC. ET AL

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-MIDDLESEX COUNTY
DOCKET NO. L-1271-90

Civil Action
Asbestos Litigation

PLAINTIFF

LOUIS DINUCCI, ET AL

VS

DEFENDANT

ARMSTRONG WORLD INDUSTRIES, INC. ET AL

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-MIDDLESEX COUNTY
DOCKET NO. L-5334-90

Civil Action
Asbestos Litigation

DEMAND FOR PRODUCTION OF DOCUMENTS

TO: **DONALD J. SEARS, ESQ.**
BUSCH & BUSCH
210 NORTH CENTER DRIVE
NORTH BRUNSWICK, NJ 08902
Attorney for Defendant: Goulds Pumps

SIRS:

PLEASE TAKE NOTICE that pursuant to R.4:18-1, request is made for the inspection and copying of the documents listed herein, at your offices at 10:00 A.M. on May 6, 1991.

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DEFINITIONS

A. "Document" or "Documents" mean the original and any identical or non-identical copy, regardless of origin or location, of any writing or record of any type or description, including, but not limited to, the original and any copy of any record, study, handwritten or other note, working papers, chart, paper, graph, index, tape, disc, data sheet or data processing card, correspondence, table, analysis, schedule, diary, message, (including but not limited to reports of telephone conversations, or conferences), magazines, booklets, circulars, bulletins, instructions, minutes, other communications, (including interoffice or intraoffice communications), purchase orders, bill of lading, bid tabulation, questionnaire, survey, contract, book of account, order, invoices, statement, bill, voucher, notebook, film,photograph, photographic negative, phonorecord, drawing recording, wire recording, transcript of recordings, drawing catalogue, brochure, any other data compilations from which information can be obtained and transcribed, punched, taped or filed.

B. GOULDS PUMPS means GOULDS PUMPS as well as all predecessor companies and all past and present associated asbestos companies.

C. "Asbestos products" means asbestos fiber as well as any product which has or had asbestos as an ingredient including friction products.

1. All documents relating to sale or supply of GOULDS PUMPS asbestos products to defendants and/plaintiffs' employers in New Jersey at any and all times during plaintiffs' employment as follows:

Employer	Dates of Employment
General Motors Trenton, NJ	1942 - 1987

2. Any and all documents pertaining to any and all known supply agreements with defendants and/or plaintiffs' employer(s) during the aforementioned years.

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3. Any and all documents reflecting the supply of asbestos fiber or asbestos containing products to defendants and/or plaintiffs' employers during relevant years.

4. Any and all purchase orders from defendants and the plaintiffs' employers requesting asbestos or asbestos containing products in #1 above during relevant years.

5. A copy of all studies in which GOULDS PUMPS has cooperated either personally or by funding other entities with relation to the effect of asbestos or asbestos containing products on the lungs and/or physical condition of persons whose employment exposed them to asbestos or asbestos containing products, including friction products together with draft copies of reports of said studies during relevant years.

6. Copies of any and all studies done by GOULDS PUMPS or in which GOULDS PUMPS has participated by funding other entities concerning the effects of inhalation of asbestos dust and fibers by one using or being exposed to asbestos or asbestos containing products during relevant years.

7. Any and all correspondence or documents relating to the notation of warnings on the packaging of GOULDS PUMPS asbestos fibers or asbestos containing products during relevant years.

8. Any photographs or exemplars of the packaging of GOULDS PUMPS asbestos fibers or asbestos containing products from 1942 - 1987.

9. All documents relating to advertising or marketing of asbestos fibers or asbestos containing products during relevant years.

10. Copies of any and all friction products advertisements published by GOULDS PUMPS during relevant years.

11. All documents relating to warning or caution signs and/or labels placed on or about GOULDS PUMPS asbestos or asbestos containing products (those which were used as well as all those which were considered but not used, during relevant years.

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Attorneys at Law

12. A copy of any and all warning placed on bags or boxes of GOULDS PUMPS friction products during relevant years.

13. Any and all intra-office correspondence or memos regarding recommendations to your employees on how to minimize exposure to asbestos during relevant years.

14. Advise whether notes, memoranda, x-rays, health records or other documents exist pertaining to pulmonary disability and carcinogenic conditions and their location which was sent by the defendant or in outside consultation firm or institute for interpretation, evaluation or testing during relevant years.

15. Advise Plaintiff whether tests and test results of any and all notes, memoranda, x-rays, health records or other documents exist and location of same which were sent by the defendant to an outside consultation firm or institute for interpretation, evaluation or testing during relevant years.

16. True copies of any and all notes, memoranda or documents which indicate the dust count for each year for which the dust count was taken, indicating the protocol that was used, the machine that was used and the conclusions that were drawn during relevant years.

17. Any and all correspondence or business records to or from any other entity regarding the hazards of asbestos or asbestos containing products to General Motors, Trenton, New Jersey.

18. Any and all correspondence from manufacturers that advised your company of the hazards of asbestos or asbestos in friction products to General Motors, Trenton, New Jersey.

19. Copies of any and all correspondence between GOULDS PUMPS and its customers concerning potential health hazards with asbestos exposure up to 1987.

20. A true copy of the Curriculum Vitae of any individual whom this defendant expects to call at trial as an expert witness.

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21. All documents which contain, refer or relate to any oral reports, conclusions or comments prepared by those individuals whom this defendant expects to call at trial as expert witnesses.

22. List all articles or publications written by any individual whom this defendant expects to call at trial as expert witness.

23. List the transcripts which exist in house of each deposition or transcript of any testimony given by each expert witness which relates to asbestos, hazards to health caused or allegedly caused by asbestos, or any other matter relevant to this litigation.

24. List the transcripts which exist in house of each deposition or transcript of any corporate representatives who have testified in any asbestos related litigation, which relates to asbestos, hazards to health caused or allegedly caused by asbestos, or any other matter relevant to this litigation.

GARRUTO, GALEX & CANTOR, ESQS.

BY: Jacqueline V. Iverson
JACQUELINE V. IVERSON

Dated: April 8, 1991

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